

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
Submitted 5/8/2006 12:12 pm
Filing ID: 48816
Accepted 5/8/2006

Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-25-35]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. To reduce the volume of paper, I have combined related requests into a single numbered interrogatory, however, I am requesting that a specific response be made to each separate question asked. To the extent that a reference is made in the responses to a Library Reference, I would appreciate receiving a copy of the reference since I am located at a distance from Washington, DC. Any reference to testimony should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-1-18 in Docket C2001-1, dated May 19, 2001, are incorporated herein by reference. In accordance with the provisions of Rule 25[b], I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

May 8, 2006

Respectfully submitted,

R20061D

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-25 When calling a local postal facility on the telephone and being placed on hold, a caller will hear "advertisements" for various postal services. [a] Please provide a transcript of the following two sequences: [1] Express Mail / Priority Mail what's the difference? [2] Priority Mail with Insurance protects your package from loss. [b] Please explain how purchasing Insurance for a Priority Mail article will protect the article from loss as opposed to providing indemnity should there be a loss.

DBP/USPS-26

For a recent year, provide the following statistics relating to Express

Mail:

[a] The total number of Express Mail articles that are mailed and the total revenue received.

[b] The number and percentage of Express Mail articles that are guaranteed for overnight, 2-day, 3-day, 4-day, and 5-day delivery?

[c] The number and percentage of Express Mail articles that are delivered overnight, on 2-days after mailing, on 3-days after mailing, on 4-days after mailing, and on 5- or more days after mailing.

[d] The number and percentage of Express Mail articles that are delivered on a day prior to the day on which delivery is guaranteed, that are delivered on the day on which delivery is guaranteed, and that are delivered one or more days after the day on which delivery is guaranteed.

[e] The number and percentage of Express Mail articles that are delivered on or before the guaranteed time. Please provide this data for an additional four or more years prior to the year utilized for each of the responses to this interrogatory.

[f] The number and percentage of Express Mail articles which were eligible for a refund of postage for not being delivered on time that resulted in a claim being made and approved for the refund of postage.

DBP/USPS-27 [a] Please provide the details and DMM/DMCS references which allow for the suspension of postage refunds for Express Mail that is not delivered within the established delivery standards. [b] Please provide details of and copies of correspondence or notifications of any instances where these provisions were invoked since the regulations were established.

DBP/USPS-28 [a] Please provide a copy of the latest listing of ZIP Codes which have street delivery of Express Mail on Sundays and holidays. [b] Please confirm, or explain if you are unable to confirm, that Sunday and holiday delivery will be made at all valid addresses at each of these ZIP Codes regardless of whether they are on a city delivery route, on a rural route, or are on an HCR route and regardless of the type of address utilized such as a street address like 125 Main Street or a rural/HCR type address like RR 2 Box 125. [c] Please provide a copy of the latest listing of ZIP Codes which have post office box delivery of Express Mail on Sundays and holidays. [d] Please advise the approximate number of active ZIP Codes in the country.

DBP/USPS-29 Please confirm, or explain if you are unable to confirm, that Express Mail may be entered into the system at any postal facility that appears in the latest National Five-Digit ZIP Code & Post Office Directory during normal business hours or with any city delivery / rural / HCR carrier or deposited in any collection box.

DBP/USPS-30 Please confirm, or explain if you are unable to confirm, that Express Mail may be addressed for delivery at any valid address [city delivery / rural / HCR / PO Box / General Delivery] postal facility that appears in the latest National Five-Digit ZIP Code & Post Office Directory.

DBP/USPS-31 Please confirm, or explain and provide a listing of the exceptions, that Express Mail which is deposited prior to the established cutoff time on a Monday at any facility referenced in Interrogatory DBP/USPS-29 [other than a military APO / FPO address] and addressed for delivery to any valid address as referenced in Interrogatory DBP/USPS-30 [other than a military APO / FPO address] will be delivered on either Tuesday or Wednesday of that week. For purposes of this interrogatory, assume that no holidays are involved.

DBP/USPS-32 Please advise the level of FedEx transportation that exists on each of the days of the week and on holidays and the day before and after a holiday. Please ensure that the response provides data when the effects of weekends and holidays are adjacent or overlap.

DBP/USPS-33 Please discuss the delivery standards that are utilized for Express Mail deposited on a Saturday prior to the cut-off time and addressed to an address that does not have Sunday delivery. Please explain whether it will all be guaranteed for delivery on Monday or some will be guaranteed for Tuesday delivery and how a mailer will be able to determine which. Assume no holidays are involved.

DBP/USPS-34 Please discuss the delivery standards that are utilized for Express Mail deposited on a Saturday prior to the cut-off time and addressed to an address that does not have Sunday or holiday delivery. Assume that Monday is a holiday. Please explain whether it will all be guaranteed for delivery on Tuesday or some will be guaranteed for Wednesday delivery and how a mailer will be able to determine which.

DBP/USPS-35

Please discuss the delivery standards that are utilized for Express Mail deposited on a Tuesday prior to the cut-off time and addressed to an address that does not have holiday delivery. Assume that Wednesday is a holiday. Please explain whether it will all be guaranteed for delivery on Thursday or some will be guaranteed for Friday delivery and how a mailer will be able to determine which.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

David B. Popkin May 8, 2006
