

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
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Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-96-97]

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."

June 8, 2006

Respectfully submitted,

R20061L

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

DBP/USPS-96 Please confirm, or explain if you are unable to confirm, that under the present regulations for the size of a Priority Mail article, a mailer need only determine whether the length plus girth is a measurement that is less than 84 inches or is between 84 and 108 inches [assuming that the article meets the minimum size requirements for mailing] and that the actual measurements are not critical. Furthermore, for articles weighing over 15 pounds, the only measurement required is whether it is less than 108 inches.

DBP/USPS-97 Please confirm, or explain if you are unable to confirm, that under the proposed regulations for the size of a Priority Mail article, a mailer must make the same measurements as specified in Interrogatory DBP/USPS-96 [other than the last sentence would

be 20 pounds if the article is destined to Local through the 4th Zone] but also must evaluate, for articles destined to the 5th through 8th Zone, whether the article is over or under 1728 cubic inches ¹in volume. If the article is over 1728 cubic inches in volume, then an accurate measurement must be taken to determine the weight to be used for calculating the proper postage.

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 June 8, 2006

¹ 1728 cubic inches is equivalent to 1 cubic foot