

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-141-171]

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."

July 3, 2006

Respectfully submitted,

R20061V141

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

DBP/USPS-141 This Interrogatory relates to the \$1 credit charge that is made to validate a Change of Address Order.

- [a] Please advise how the credit card charge is processed.
- [b] What information or data is provided by the Postal Service to the credit card company?
- [c] What information or data is provided by the credit card company to the Postal Service as a result of the processing of the charge?
- [d] What use is made of the information that is provided by the credit card company to the Postal Service?
- [e] Must the name on the credit card match the name on the Change of Address Order?
- [f] If the name does not match, what action is taken by the Postal Service?

- [g] Must the billing address on the credit card match the old address on the Change of Address Order?
- [h] If the billing address does not match the old address, what action is taken by the Postal Service?
- [i] Must the billing address on the credit card match the new address on the Change of Address Order?
- [j] If the billing address does not match the new address, what action is taken by the Postal Service?
- [k] Why was the \$1 amount chosen for the credit card validation?
- [l] Could it have been more?
- [m] Could it have been less?
- [n] If a customer purchases a single one-cent postage stamp at a retail service window, may he/she use a credit or debit card to pay for the purchase?
- [o] If not, why not?

DBP/USPS-142 Please refer to your response to Interrogatory DBP/USPS-98 subpart a.

- [a] Please explain why the Postal Service has not worked out implementation procedures prior to submitting the proposal to the Postal Rate Commission?
- [b] Please confirm, or explain if you are unable to confirm, that the implementation procedures are important to the understanding and evaluation of the proposal.
- [c] Please advise when the implementation procedures will be completed?
- [d] If they will not be available prior to the end of discovery, how will the participants in this Docket be able to comment on the procedures and advise the Commission on the appropriateness of the implementation procedures?

DBP/USPS-143 Please refer to your response to Interrogatory DBP/USPS-98 subpart a.

- [a] Please confirm, or explain if you are unable to confirm, that if a dimension of a parcel was measured as 18-1/2 inches and it was rounded off to the nearest whole inch that the calculation would utilize 19 inches as that dimension.
- [b] Will the rounding off to the nearest inch be a mandated or a permissible procedure?

[c] Is the rounding off to the nearest inch a mandated or a permissible procedure with respect to any other measurements utilized in evaluating compliance with existing requirements for letters, flats, or parcels? Please explain and discuss.

[d] Please confirm, or explain if you are unable to confirm, that if a parcel had a length, width, and height of 18-1/2 inches and rounding was not done, the dimension weight would be 33 pounds while if the 18-1/2 inches was rounded off to 19 inches the dimension weight would be 36 pounds. Similarly, if the length, width, and height were 13-1/2 inches, the dimension weight would change from 13 to 15 pounds as a result of rounding to the nearest inch.

DBP/USPS-144 Please refer to your response to Interrogatory DBP/USPS-93.

[a] Has that ever been the Postal Service policy?

[b] If so, please explain and discuss.

[c] Please provide and discuss the current Postal Service policy with respect to the sale of philatelic stamps, items, and products.

DBP/USPS-145 Please refer to your response to Interrogatory DBP/USPS-100. The referenced DMM section contains four pages. Which specific subsections of that section relate to the three specific questions that I asked in my original interrogatory?

DBP/USPS-146 Please refer to your response to Interrogatory DBP/USPS-90.

[a] Please relate the details of the discussions that have taken place that you characterize as not being significant.

[b] Please provide and discuss details of any discussions, whether they are characterized as significant or not, about moving the Day 0 cutoff times and/or collection times earlier to, in effect, increase the Service Standards for First-Class Mail and/or Priority Mail by one or more days. For example, by moving the collection time on a blue collection box from 5 P.M. to 10 A.M., a letter mailed at 4 P.M. Monday will now be delivered in a neighboring town on Wednesday rather than Tuesday.

DBP/USPS-147 Please refer to your response to Interrogatory DBP/USPS-89 subpart c. The requested chart was to include along the top of the chart the percent delivered by Day 9 and by Day 10. Please provide a chart which shows the requested data.

DBP/USPS-148 Please refer to your response to Interrogatory DBP/USPS-39. Please respond to the original Interrogatory. The term "educated choice" is defined as being aware of the potential for a different cost for the use of a non-flat rate box and should that cost be less than the flat rate box having a valid reason for paying the higher postage rate.

DBP/USPS-149 Please refer to your response to Interrogatory DBP/USPS-37.

[a] Please furnish copies of any guidelines that are furnished to acceptance clerks which will enable them to fairly evaluate the provisions of DMM Section 101.1.2 to determine the proper implantation of the nonmachinable surcharge in general and specifically to the mailpiece that was described in the original interrogatory.

[b] Please indicate why a cloth-type bow that created a bump that was only 0.07 inches high would be equated with the specific items that are enumerated in subsection d of DMM Section 101.1.2 to cause the mailpiece to be considered uneven and therefore subject to the nonmachinable surcharge.

[c] Please confirm, or explain if you are unable to confirm, that the mailing of a key that is not loose or a coin that is not loose will not require, in and of itself, the payment of the nonmachinable surcharge.

[d] Please confirm, or explain if you are unable to confirm, that the operative word in subsection d of DMM Section 101.1.2 are the specific items such as pens, pencils, or loose keys or coins and not the word uneven. In other words, just because the mailpiece is uneven, does not, in and of itself, mandate the surcharge.

[e] If a piece of tape is placed over a clasp on an envelope, is the nonmachinable surcharge still mandated?

[f] If so, please explain.

DBP/USPS-150 Please refer to your response to Interrogatory DBP/USPS-27 and 30.

[a] Please provide copies of any updates to the August 30, 2005 letter. Please provide the current listing of those categories of Express Mail that are ineligible for refunds of postage for failure to meet service standards.

[b] Please provide an updated listing of all of the offices to which Express Mail may not be sent.

DBP/USPS-151 [a] Please provide me a listing of the percentage of the retail service windows that are open on Saturday countrywide as well as a separate listing broken out by District.

[b] Please provide me a listing of the percentage of the post office box lobbies that are open on Saturday countrywide as well as a separate listing broken out by District.

[c] Please provide the criteria that are considered for the establishment of Saturday post office lobby hours at a particular facility.

[d] Please provide the criteria that are considered for the establishment of Saturday retail window service hours at a particular facility.

DBP/USPS-152 Please refer to your response to Interrogatory DBP/USPS-22 subpart b. Please advise if the words "post office is closed" refer to the retail service windows or the post office box lobbies or both.

DBP/USPS-153 Please confirm, or explain if you are unable to confirm, that city delivery carriers provide delivery service on six days a week, Monday through Saturday except for national holidays, at all offices.

DBP/USPS-154 Please confirm, or explain and attempt to quantify the extent to which there is less than six day delivery if you are unable to confirm, that rural route carriers provide delivery service on six days a week, Monday through Saturday except for national holidays, at all offices.

DBP/USPS-155 Please confirm, or explain and attempt to quantify the extent to which there is less than six day delivery if you are unable to confirm, that highway contract route carriers provide delivery service on six days a week, Monday through Saturday except for national holidays, at all offices.

DBP/USPS-156 Please refer to your response to Interrogatory DBP/USPS-22 subparts c through h. Please explain how post office box service can be considered a premium service when the service at certain facilities is only provided five days a week while city delivery service at a the same post office is provided six days a week.

DBP/USPS-157 This interrogatory relates to the ability of a postal customer to claim mail for which a notice has been left, such as accountable mail, on a non-holiday Saturday at a facility that does not have retail window service available on that Saturday. If there is a different pick-up rule for a carrier customer vs. a post office box customer, please explain.

[a] Is it mandated that this ability exist?

[b] If not mandated, is it the normal custom to provide such service?

[c] If not, why not?

DBP/USPS-158 Please refer to your response to Interrogatory DBP/USPS-23 subpart c. Please advise what in my original interrogatory has caused the Postal Service not to be able to confirm my request. The original question stated in a different manner [with dates and times] is as follows: At a post office with a posted up-time of 10 AM, an EXFC Reporter collects the mail at 11 AM on Monday. At 12 Noon on Monday a letter is placed into the Reporter's box and collected by the Reporter at 11 AM on Tuesday. The letter is reported as having been delivered on Tuesday.

DBP/USPS-159 Please refer to your response to Interrogatory DBP/USPS-23.

[a] Please advise why the reference to Express Mail is limited to guaranteed next-day delivery as opposed to indicating that it may not be guaranteed for later than next-day.

[b] Please advise why the reference to Priority Mail does not indicate may also be delivered overnight.

[c] Please confirm, or explain if you are unable to confirm, that by not indicating that some Priority Mail is delivered overnight may cause some customers to utilize Express Mail unnecessarily.

[d] Please confirm, or explain if you are unable to confirm, that the Postal Service will correct these two items as noted above and also in the response to the original subpart b.

DBP/USPS-160 Please refer to the response to Interrogatory DBP/USPS-28 subparts a and c.

[a] How frequently are updates to this listing made?

[b] Please provide an updated listing if available.

DBP/USPS-161 Please refer to the response to Interrogatory DBP/USPS-31. Your response refers to service related to domestic destinations within the 969 ZIP Code.

[a] Please discuss the ability to achieve Express Mail delivery when the effects of the International Dateline are not considered.

[b] For example, confirm, or explain if you are unable to confirm, that an Express Mail article that does not cross the International Dateline [is mailed and destined for delivery on the same side of the Line] on a Monday prior to the cut-off time will be guaranteed for delivery on either Tuesday or Wednesday.

[c] Furthermore, an Express Mail article mailed on the 48-states side of the International Dateline and destined for an area on the Guam side of the International Dateline on a Monday prior to the cut-off time will be guaranteed for delivery on either Wednesday or Thursday [local day at the point of delivery].

[d] Furthermore, an Express Mail article mailed in the opposite direction as noted in subpart c above will be guaranteed for delivery on either Monday or Tuesday [local day at the point of delivery].

DBP/USPS-162 Please confirm, or explain if you are unable to confirm, that an Express Mail article which is mailed on the day prior to one non-delivery day [prior to the cut-off time] such as on a Saturday prior to a Sunday [or the day prior to a holiday such as July 3, 2006], will be guaranteed for delivery on either Sunday [if the delivery ZIP Code is on the list and transportation is available] or no later than Monday. Any effect of the International Dateline will be as noted in response to Interrogatory DBP/USPS-161.

DBP/USPS-163 Please confirm, or explain if you are unable to confirm, that an Express Mail article which is mailed on two days prior to one non-delivery day [prior to the cut-off time] such as on a Friday prior to a Sunday [or two days prior to a holiday such as November 21, 2006], will be guaranteed for delivery on either Saturday or Sunday if the delivery ZIP Code is on the list or Monday. if the delivery ZIP Code is not on the list. Any effect of the International Dateline will be as noted in response to Interrogatory DBP/USPS-161.

DBP/USPS-164 Please confirm, or explain if you are unable to confirm, that an Express Mail article which is mailed on the day prior to two consecutive non-delivery days [prior to the cut-off time] such as on a Saturday prior to a Monday holiday will be guaranteed for delivery on either Sunday or Monday if the delivery ZIP Code is on the list or Tuesday if the delivery ZIP Code is not on the list. Any effect of the International Dateline will be as noted in response to Interrogatory DBP/USPS-161.

DBP/USPS-165 Please confirm, or explain if you are unable to confirm, that an Express Mail article which is mailed after the cut-off time will be guaranteed for delivery no later than it would be guaranteed if it was mailed prior to the cut-off time on the next business day.

DBP/USPS-166 [a] Please discuss and explain any restrictions or criteria considered with respect to the setting of a cut-off time at a specific acceptance point. Please distinguish between overnight vs. non-overnight guarantees and the relationship of the cut-off time to the retail window service hours or day of the week.

[b] If an office is permitted to establish a cut-off time prior to the opening of the retail service window hours - such as a cut-off at 7 AM and the window doesn't open until 8 AM, how can a mailer deposit Express Mail that day?

DBP/USPS-167 Please advise all instances that exist, either due to the distances involved and/or the failure to provide the necessary transportation, that will keep the Postal Service from meeting 365-days a year the guaranteed delivery dates that are enumerated in the responses to Interrogatories DBP/USPS-31 and 161 through 165. This does not include articles that are mis-sent or are subject to a delay of an established and scheduled transportation service.

DBP/USPS-168 Please advise all instances where postage stamps have been sold at a value which is more or less than the value imprinted on the stamp. Please identify the stamp and include the date of issue, description of the stamp, the value imprinted on the stamp, the price for which it was sold, and the reasons for the difference in price.

DBP/USPS-169 Please advise all instances where postal/stamped cards have been sold at a value which is more or less than the value imprinted on the stamp or that value plus a maximum of two cents. Please identify the card and include the date of issue, description of the card, the value imprinted on the card, the price for which it was sold, and the reasons for the difference in price.

DBP/USPS-170 Please advise all instances where stamped stationery/envelopes have been sold at a value which is more or less than the value imprinted on the stamp or that

value plus a maximum of eight cents. Please identify the item and include the date of issue, description of the item, the value imprinted on the item, the price for which it was sold, and the reasons for the difference in price.

DBP/USPS-171 Please describe and identify any stamps, cards, envelopes, stationery, etc. that have been issued by the United States Postal Service and/or Post Office Department that are no longer valid for use. Please provide the reason for the invalidation.

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 July 3, 2006
