

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS YEH  
TO INTERROGATORIES OF DAVID B. POPKIN  
(DBP/USPS-T38-1 - 21)**

The United States Postal Service hereby provides the responses of witness Yeh to the following interrogatories of David B. Popkin, filed on June 22, 2006: DBP/USPS-T38-1 - 21.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-T38-1.** Please refer to your testimony at page 6, fn. 2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, please advise the changes that will be necessary to the DMCS for this proposed curtailment of service.

**Response:** I am not proposing any changes to the DMCS language for Bound Printed Matter in this regard other than the name change referred to on the page you cited.

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**DBP/USPS-T38-2.** Please refer to your testimony at page 6, fn. 2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, please advise the changes that will be necessary to the DMM for this proposed curtailment of service.

**Response:** Please note that revision of specific DMM provisions is not within the scope of my testimony or the rate case generally. It is my understanding that revising the DMM is an ongoing process and will be finalized by the Postal Service based on the outcome of the case.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH  
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**DBP/USPS-T38-3.** Please refer to your testimony at page 6, fn. 2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to either pay part, all, or an excess amount of postage by means of a postage meter stamp or stamps and the rest, if any, by any other means, including, but not limited to regular postage stamps. If not, please explain the rationale behind your response.

**Response:** The postage for the piece would be required to be paid using customer-generated postage meter, including PC postage, or by permit imprint. My understanding is that it is the Postal Service's view that Bound Printed Matter is essentially a commercial product. Limiting payment options to those typically used by commercial mailers will help clarify our product offering.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH  
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**DBP/USPS-T38-4.** Please refer to your testimony at page 6, fn. 2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to either pay part, all, or an excess amount of postage by means of an Automated Postal Center [APC] stamp or stamps and the rest, if any, by any other means, including, but not limited to regular postage stamps. If not, please explain the rationale behind your response.

**Response:** Please see my response to DBP/USPS-T38-3 and DFC/USPS-T38-3.

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**DBP/USPS-T38-5.** Please refer to your testimony at page 6, fn. 2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to either pay part, all, or an excess amount of postage by means of a computer generated stamp or stamps such as those provided by stamps.com and the rest, if any, by any other means, including but not limited to regular postage stamps. If not, please explain the rationale behind your response.

**Response:** Please see my response to DBP/USPS-T38-3.

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**DBP/USPS-T38-6.** Please refer to your testimony at page 6, fn. 2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to mail the article with a rural delivery letter carrier? If not, please explain the rationale behind your response.

**Response:** I am not an expert on mail entry issues but it is my understanding that a customer will be able to mail a Nonpresort BPM piece with a rural delivery letter carrier, given that the customer-generated postage is appropriate.

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**DBP/USPS-T38-7.** Please refer to your testimony at page 6, fn. 2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to mail the article with a city delivery letter carrier? If not, please explain the rationale behind your response.

**Response:** I am not an expert on mail entry issues but it is my understanding that a customer will be able to mail a Nonpresort BPM piece with a city delivery letter carrier, given that the customer-generated postage is appropriate.

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**DBP/USPS-T38-8.** Please refer to your testimony at page 6, fn. 2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to mail the article with a highway contract delivery letter carrier? If not, please explain the rationale behind your response.

**Response:** I am not an expert on mail entry issues but it is my understanding that a customer will be able to mail a Nonpresort BPM piece with a highway contract delivery letter carrier, given that the customer-generated postage is appropriate.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH  
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**DBP/USPS-T38-9.** Please refer to your testimony at page 6, fn. 2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to mail the article with any of the ancillary services such as, but not limited to, Certificate of Mailing, Delivery Confirmation, Signature Confirmation, Insurance, COD? If so, please describe the method that would be utilized. If not, please explain the rationale behind your response.

**Response:** No, because this situation would involve a retail transaction.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH  
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**DBP/USPS-T38-10.** Please refer to your testimony at page 6, fn. 2. [a] Please advise why the Postal Service believes that it is necessary to simplify window service operations. [b] Please describe how you believe this proposed regulation will achieve that objective.

**Response:** Although the subject is outside the scope of my testimony, it is my understanding that simplifying operations could potentially reduce waiting time and reduce window costs. My understanding is that under the planned change, window clerks would offer only those services most likely to be used by retail customers.

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**DBP/USPS-T38-11.** Please refer to your testimony at page 6, fn. 2. [a] Please advise why the Postal Service believes that it is necessary to reduce the complexity of retail transactions for customers. [b] Please describe how you believe this proposed regulation will achieve that objective.

**Response:** Please see my response to DBP/USPS-T38-10.

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**DBP/USPS-T38-12.** Please refer to your testimony at page 6, fn. 2. Please enumerate and fully discuss any other reasons that exist for introducing this regulation other than those specified in interrogatories 10 and 11. If there are no other reasons, so state.

**Response:** The footnote and my answers to interrogatories concerning it provide all the reasons of which I am aware.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH  
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**DBP/USPS-T38-13.** Please refer to your testimony at page 6, fn. 2. Please describe the characteristics of a mailpiece that would be eligible for mailing as Media Mail but would not be eligible to mail as Bound Printed Matter.

**Response:** Please refer to sections 163 and 173 of the Domestic Mail Manual.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH  
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**DBP/USPS-T38-14.** Please refer to your testimony at page 6, fn. 2. Please describe the characteristics of a mailpiece that would be eligible for mailing as Bound Printed Matter but would not be eligible to mail as Media Mail.

**Response:** Please see my response to DBP/USPS-T38-13.

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**DBP/USPS-T38-15.** Please refer to your testimony at page 6, fn. 2. Please describe the characteristics of a mailpiece that would be eligible for mailing as Bound Printed Matter but would not be eligible to mail as either Express Mail, Priority Mail, First-Class Mail, or Parcel Post.

**Response:** Please refer to sections 113, 123, 133, 153, and 163 of the Domestic Mail Manual.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH  
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**DBP/USPS-T38-16.** Please refer to your testimony at page 6, fn. 2. Please describe why you believe a retail customer can not make an easily distinguishable choice to use Bound Printed Matter [if the contents of the mailpiece are authorized] over Media Mail or Parcel Post.

**Response:** It is not my testimony that a retail customer cannot “make an easily distinguishable choice to use Bound Printed Matter over Media Mail or Parcel Post.” My understanding is that having clerks offer only those services most likely to be used by customers will help streamline the retail transaction for both customers and clerks. The change discussed affects only the postage payment options for those customers who choose to use Bound Printed Matter.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH  
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**DBP/USPS-T38-17.** Please refer to your testimony at page 6, fn. 2. Please confirm that the delivery service standards for Bound Printed Matter are the same as for Parcel Post and/or Media Mail. If not, please explain.

**Response:** Confirmed.

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**DBP/USPS-T38-18.** Please refer to your testimony at page 6, fn. 2. Please discuss why you believe that this reduction in service will not be a change in the nature of postal services which will generally affect service on a nationwide or substantially nationwide basis.

**Response:** I am not a lawyer and cannot provide the legal opinion sought.

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**DBP/USPS-T38-19.** Please refer to your testimony at page 6, fn. 2. Please confirm, or explain if you are unable to confirm, that the postage rates for single piece Bound Printed Matter will in all cases be less than that for Parcel Post.

**Response:** Confirmed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH  
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**DBP/USPS-T38-20.** Please refer to your testimony at page 6, fn. 2. Please confirm, or explain if you are unable to confirm, that the postage rates for single piece Bound Printed Matter will either be more or less than that for Media Mail depending on the zone.

**Response:** Confirmed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH  
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**DBP/USPS-T38-21.** Please advise the Rate Schedule and Page Number of Attachment A of the R2006-1 Request showing the current and proposed rates for Bound Printed Matter, Media Mail, and Library Mail.

**Response:** Please refer to pages 58 to 64 of Attachment A filed on May 4, 2006 under the title, "Att A - Rate Fee Scheds REV.pdf."