

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE  
[DBP/USPS-266-271]

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 12, 2006

Respectfully submitted,

R20061EE266

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

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DBP/USPS-266                      Please provide annual data for each of the past three years showing the percentage of single-piece Bound Printed Matter articles that were mailed which also qualified for mailing as Media or Library Mail. If actual data are not available, please provide the best available estimate and the criteria that were utilized to make that estimate.

DBP/USPS-267                      Please furnish a copy of the Office of the Inspector General's Report IS-OR 06-005 that relates to National Change of Address - Emergency Preparedness and Report IS-MA 06-003 that relates to Security Vulnerability Assessment and Audit of

Automated Postal Center Systems. If it is filed as a Library Reference, please furnish me with a hard copy.

DBP/USPS-268                      Please furnish the most recent First-Class Mail EXFC results for a minimum of four quarterly reports. The left side of the charts should show the Nation followed by each of the 80-some EXFC reporting areas and along the top of the chart showing Percent on Time / Margin of Error / Average Days to Deliver / Margin of Error for the following four categories: Overnight Mail / Two-Day Mail / Three-Day Mail / Nation. Please show all entries to two decimal places.

DBP/USPS-269                      Please confirm, or explain if you are unable to confirm, that the various criteria which presently will result in the imposition of the nonmachinable surcharge for a one ounce First-Class Mail article will, under the proposed regulations, cause a mailpiece which otherwise would pay the rate for letter mail to pay the rate for flat mail. Furthermore, under the proposed regulations mailpieces which qualify for mailing at the rate for flats and parcels will not be affected should the mailpiece have any of those nonmachinable characteristics.

DBP/USPS-270                      [a]     Please confirm, or explain if you are unable to confirm, that a single-piece First-Class Mail article that meets all of the size and weight requirements for mailing at the rate for flat mail will always pay that rate. That is, there are no characteristics which would cause it to pay any other rate.

[b]     If not, please list the characteristics that would cause a rate other than the rate for flat mail and provide the rate that would be required.

[c]     Same as subparts a and b except for parcel mail size and weight requirements.

DBP/USPS-271                      [a]     Please explain why the DMCS name for single-piece Bound Printed Matter is being changed to Non-presort Bound Printed Matter.

[b]     Are there any other mail classes which may be mailed as a single piece which are not called Single-Piece in the DMCS?

[c]     If so, please specify.

[d]     Are any of these mail classes having the name changed to Non-presort?

[e]     If so, please list. If not, please explain why not.

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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 12, 2006

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