

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
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EVOLUTIONARY NETWORK DEVELOPMENT]
SERVICE CHANGES, 2006]

DOCKET NO. N2006-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-92-94]

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 19, 2006
N20061T92

Respectfully submitted,

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

DBP/USPS-92

Please refer to the response to Interrogatory DBP/USPS-60.

[a] Please advise why the response to this Interrogatory was filed 13 weeks and 6 days later than required by the Commission's Rules of Practice.

[b] Please confirm, or explain if you are unable to confirm, that had the response to this Interrogatory been timely made, there would have been no restriction on the type of Interrogatories that could have been filed.

[c] Please confirm, or explain if you are unable to confirm, that since the response to the Interrogatory was delayed and not made until after the close of discovery, the only type of

Interrogatories that can be made are ones that meet the strict requirements for a follow-up Interrogatory.

DBP/USPS-93 Please refer to the response to Interrogatory DBP/USPS-60 subpart a. Please advise if the data file that was provided in the listing of the some 1900+ facilities has any of the items that were requested by me redacted. If so, please provide the specific data that I had originally requested with respect to the 1900+ facilities as opposed to referring me to the response to the APWU Interrogatory.

DBP/USPS-94 Please refer to the response to Interrogatory DBP/USPS-60 subparts b and d.

[a] Please discuss and explain exactly what the list represents and the types of facilities that are on the list.

[b] Please define the term "end of run".

[c] Does this listing represent a snapshot of what facilities were in operation on March 21, 2006, or does it also include facilities that terminated activity prior to that date?

[d] Please provide a listing of those facilities that were active on March 21, 2006, or at any other date after March 21, 2006.

[e] Please explain and discuss what the term "if it was ever mapped into the end of run system." means in the response to subpart d.

[f] Please confirm, or explain if you are unable to confirm, that Englewood NJ 07631 should not be listed on a current listing of facilities.

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 19, 2006
