

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES  
POSTAL SERVICE [DBP/USPS-370-416]

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 24, 2006

Respectfully submitted,

R20061KK370

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

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DBP/USPS-370

Please refer to your response to Interrogatory DBP/USPS-141.

[a] In the response to subpart e you stated that the name on the credit card must match the name on the Change of Address Order. In the response to subpart c you stated that the only information provided by the credit card company to the Postal Service is whether the card is authorized or rejected. Please explain how the Postal Service will have knowledge of the name on the credit card to make a determination of whether or not it matches the name on the Change of Address Order.

[b] Must the name on the credit card match the name on the Change of Address Order in all respects such as use or non-use of a middle initial and/or the use of a full first name vs. an initial only?

[c] Can the credit card be in the name of the spouse when the Change of Address Order is in the name of the other spouse?

[d] Please explain how an automated system will be able to make the determination of the name match.

[e] In the response to subpart g you stated that the billing address on the credit card must match either the old or new address on the Change of Address Order. In the response to subpart c you stated that the only information provided by the credit card company to the Postal Service is whether the card is authorized or rejected. Please explain how the Postal Service will have knowledge of the billing address on the credit card to make a determination of whether or not it matches the address on the Change of Address Order.

[f] Must the billing address on the credit card match either the old or new address on the Change of Address Order in all respects such as the use of "Ave." vs. "Avenue" or a 5-digit vs. a 9-digit ZIP Code or the name of the post office [whether the name of the delivery station or branch is utilized in place of the parent post office such as Weston vs. Fort Lauderdale in Florida].

[g] Please explain how an automated system will be able to make the determination of the address match.

[h] Does the [www.usps.com](http://www.usps.com) website advise the customer who is submitting an online Change of Address Order of the need for both the name match and the address match?

[i] If not, why not?

DBP/USPS-371 Please refer to your response to Interrogatory DBP/USPS-141.

[a] Please refer to the response to subpart k. Is one dollar still the lowest minimum charge common to all credit cards for credit card validation?

[b] If not, what is the present value?

[c] Is there a difference between the term "credit card validation" utilized in the response to subpart k and the credit card charge processing as a result of a purchase transaction at a retail window as noted in subpart n?

[d] If so, please explain and discuss.

[e] Please explain the rationale behind the response to subpart m as to why the charge can not be less than one dollar.

[f] Please explain the apparent difference between the response to subpart k which states there is a minimum charge of one dollar and the response to subpart n which indicates that a one cent purchase may be put on a credit/debit card.

DBP/USPS-372 Please refer to your response to Interrogatory DBP/USPS-142 subpart d. Please advise the conditions under which the Postal Service has or will in the future allow for comments by the mailing public prior to implementing changes to the Domestic Mail Manual.

DBP/USPS-373 Please refer to your response to Interrogatory DBP/USPS-144.

[a] Your response appears to be made with respect to the various philatelic products such as mugs and books rather than to the actual stamps. Please respond to the original interrogatory with respect to stamps themselves.

[b] Please advise any unwritten policies that exist.

DBP/USPS-374 Please refer to your response to Interrogatory DBP/USPS-145. I am unable to evaluate the DMM Sections with respect to determining an answer to Number 3 of the original interrogatory, namely, " 3. The need to purchase a replacement article of merchandise for availability at a specific event."

[a] For example, if I ship a camera to my brother [for use at a Saturday night wedding] on Friday by Express Mail with a guaranteed delivery of noon on Saturday and it does not arrive in time for the wedding, specifically, what compensation will be paid in addition to the refund of the original postage?

[b] Will payment be made for the purchase or rental of a replacement camera?

[c] Please provide the rationale for your response.

DBP/USPS-375 Please refer to your response to Interrogatory DBP/USPS-147.

[a] Please confirm, or explain if you are unable to confirm, that the service standards for Package Services extend up to a maximum of 9 days.

[b] Based on the response to subpart a, please explain why the Postal Service does not track data for Package Services for Day 9.

DBP/USPS-376 Please refer to your response to Interrogatory DBP/USPS-149 subpart a.

[a] Please confirm, or explain if you are unable to confirm, that the only guidelines that are provided to the postal acceptance clerks is the appropriate section of the Domestic Mail Manual.

[b] Please confirm, or explain if you are unable to confirm, that by not having guidelines it can lead to uneven application of the requirements.

DBP/USPS-377 Please refer to your response to Interrogatory DBP/USPS-149 subpart d.

[a] Please confirm, or explain if you are unable to confirm, that the Postal Service does not apply a literal interpretation of charging the nonmachinable surcharge just because the mailpiece is uneven such as may be caused by affixing a label to the envelope or by having an enclosure that does not occupy the full shape of the envelope but will apply the surcharge if the mailpiece is uneven when caused by items such as pens, pencils, or loose keys or coins.

[b] How is a mailer aware of this policy?

DBP/USPS-378 Please refer to your response to Interrogatory DBP/USPS-149 subparts e and f. Assume that a mailpiece is a standard 6- by 9-inch kraft envelope with a metal clasp. Does the nonmachinable surcharge apply to this mailpiece because of the unevenness caused by the thickness of the physical clasp and/or the ability of the clasp to catch on something else and/or the rigidity caused by the metal clasp and/or another reason [please provide]?

DBP/USPS-379 Please refer to your response to Interrogatory DBP/USPS-156. Your reference to the response to Interrogatory DFC/USPS-T41-8 does not appear to match my Interrogatory which relates to the comparison of post office box service vs. city delivery service at the same facility.

[a] Please respond to the original Interrogatory.

[b] Please explain how having public access to a box section can reduce the level of security to mail contained in individual locked boxes in the facility.

[c] Please confirm, or explain if you are unable to confirm, that even if a boxholder normally picks up mail on Monday through Friday, that there may be an instance where a Saturday pick-up is desired.

DBP/USPS-380                    Please refer to your response to Interrogatory DBP/USPS-161 subpart d.

[a]     Please confirm, or explain if you are unable to confirm, that when it is Monday in Guam it will be Sunday on the 48-states side of the International Dateline.

[b]     Please confirm, or explain if you are unable to confirm, that if the Express Mail article mailed in Guam on Monday prior to the cut-off time and destined to an area on the 48-states side of the International Dateline was delivered as expeditiously as possible, namely, it was delivered on the next "physical" day, the local date at the point of delivery would be Monday.

[c]     Please reevaluate the response to the original subpart d.

DBP/USPS-381                    Please refer to your response to Interrogatory DBP/USPS-166 subpart a. The response that was provided did not address whether there are any restrictions that exist for setting various cut-off times, such as, must the cut-off time for 2-day Express Mail be no earlier than 5 PM. Please reanswer the original Interrogatory and provide the rationale for your response.

DBP/USPS-382                    Please refer to your response to Interrogatory DBP/USPS-166 subpart b.

[a]     Please confirm, or explain if you are unable to confirm, that if an office had a 7 AM cut-off time and the window didn't open until 8 AM, a mailer could not achieve the same level of service for an Express Mail article that would be available if the retail window service started at 6 AM and the mailpiece was deposited between 6 AM and 7 AM.

[b]     Please reanswer the original Interrogatory and provide the rationale for your response.

DBP/USPS-383                    Please refer to your response to Interrogatory DBP/USPS-168.

[a]     Please confirm, or explain if you are unable to confirm, that one of the earlier self-adhesive 29-cent stamps [there were several different versions of the stamp with the denomination printed in different colors] was issued in a sheet of 17 stamps that initially sold for \$5.00 or 7¢ more than the face value of the stamps.

[b]     Please advise why the price of the stamps noted in subpart a above had the price changed to the face value of \$4.93 including the applicability of 18 USC 1721.

[c]     Please file a copy of the latest version of The Postal Service Guide to U.S. Stamps referred to in your response as a Library Reference.

DBP/USPS-384 Please refer to your response to Interrogatory DBP/USPS-169. Please confirm, or explain if you are unable to confirm and also provide the requested information, that all of the items referred to in your response as a philatelic post card are listed in the latest version of The Postal Service Guide to U.S. Stamps and that all of the requested information is shown.

DBP/USPS-385 Please refer to your response to Interrogatory DBP/USPS-171.

[a] Please refer to DMM Section 604.1.2 and 604.1.3 and reanswer the original Interrogatory.

[b] May special handling and/or Certified Mail stamps be utilized to pay part or all of the fee for the special service [as opposed to paying the postage on the underlying mailpiece]?

[c] If not, please explain.

[d] Please confirm, or explain if you are unable to confirm, that special delivery no longer exists as a service.

[e] Please advise what refund is available to a person who has special delivery stamps that may no longer be used and if your response to subpart b above is no has special handling and/or Certified Mail stamps that may no longer be used.

DBP/USPS-386 Please refer to your response to Interrogatory DBP/USPS-173. It appears that the response made to this Interrogatory was misunderstood. The question that I have is what changes were made between the Appendix II of the EXFC Statement of Work that was utilized in Docket R2005-1 [even though the appendices were not furnished in that Docket] and the unredacted version of Appendix II that was provided in Docket R2006-1 Library Reference USPS-LR-L-134.

DBP/USPS-387 Please refer to your response to Interrogatory DBP/USPS-174. Please advise the weight of the 1st, 2nd, 3rd, and 5th mailpieces listed on page 1.

DBP/USPS-388 Please refer to your response to Interrogatory DBP/USPS-177. I realize that the objective is to achieve a panel of ZIP Codes that will represent 90% of the First-Class Mail originating volume and 80% of the destinating volume.

[a] Please explain why these values were chosen.

[b] Please explain why EXFC does not test 100% of all First-Class Mail volume.

[c] Since there are an infinite number of possible combinations of which ZIP Codes are in the program vs. which are not, please explain how they are chosen. For example, are remote areas more or less likely to be chosen? Are low volume areas more or less likely to be chosen?

DBP/USPS-389 Please refer to your response to Interrogatory DBP/USPS-182. Please confirm, or explain if you are unable to confirm, that the procedures indicated in subparts b through d of the original interrogatory have been instituted after the EXFC program started and are in place at many post offices throughout the country.

DBP/USPS-390 Please refer to your response to Interrogatory DBP/USPS-183. Please confirm, or explain if you are unable to confirm, that, in general, if a Postmaster and/or a member of his/her staff at an individual post office removes one or more collection boxes they may believe that they will have either an improved EXFC score and/or an easier time to achieve the EXFC score.

DBP/USPS-391 Please refer to your response to Interrogatory DBP/USPS-184. Please confirm, or explain if you are unable to confirm, that, in general, if a Postmaster and/or a member of his/her staff at an individual post office advances the collection time of one or more collection boxes they may believe that they will have either an improved EXFC score and/or an easier time to achieve the EXFC score.

DBP/USPS-392 Please refer to your response to Interrogatory DBP/USPS-186.

[a] Please advise which specific words in the referenced response indicate the procedures that are utilized to ensure that the data provided by EXFC droppers is accurate,

### B.3 Responsibilities

Test pieces must be entered into the mail stream in unbanded bundles. Droppers must induct mail during the allowable drop window that begins on the scheduled date of induction at 5:00 AM and continues until 30 minutes before the last scheduled pick up time. The only circumstance that a dropper will be allowed to induct mail prior to the induction day is when the last pickup time on the Collection Box Management System (CBMS) listing (this is provided to the supplier by the USPS) is later than the last pickup time posted on the selected collection box. In this instance only, the supplier may change the induction date from the day of the scheduled induction to the next day.

Droppers must record the following information from Decal 55, Collection Box Label (see Appendix VII): collection box ID number, last pickup time, address and date label printed. Any discrepancy must be reported to the supplier. If a discrepancy occurs concerning the last pickup time, Decal 55 information will determine the last pickup time.

The supplier will incorporate the use of cellular phones or other appropriate technology within the induction process. This technology, used by droppers to relay information at induction, will be checked for accuracy.

Droppers must notify the supplier, via the technology referred to above, of actual drop times and locations of all inductions on the day of induction. The supplier must produce documentation to USPS in all cases where changes to the original schedule occur. The supplier must also provide a report showing the number of times the scheduled induction date differs from the actual induction date for each dropper in every Performance Cluster. Also, if there is more than a two hour deviation from the forecasted induction time scheduled, the supplier must inform the COR. Finally, the supplier must develop a quality check to identify possible confidentiality breaches for droppers and reporters.

- [b] If there are no independent methods that are utilized to determine that the data provided by EXFC droppers is accurate, so state.
- [c] Are there any changes between the wording shown above which is from USPS-LR-K-127 and the corresponding paragraph in the current USPS-LR-L-134?
- [d] If so, please advise the changes.

DBP/USPS-393 Please refer to your response to Interrogatory DBP/USPS-188.

- [a] Please advise which specific words in the referenced response indicate the procedures that are utilized to ensure that the data provided by EXFC reporters is accurate,

### C.3 Responsibilities

On the day each test mail piece is received, reporters are required to write the date of receipt on the portion of the test piece that includes the test piece identification. Reporters must call the supplier within 24 hours of receipt to report the test mail. After the reporters call in the receipt information, they must place all insert sheets back into the correct test envelopes. Reporters must retain EXFC test mail pieces for at least 60 days.

Reporters must notify the supplier if they are unable to receive mail for any reason. Such reasons may include vacation, illness and destruction of mailboxes. The reporter response rate must be at least 90%.

Boxholder reporters must supply the posted box mail available time to the supplier.

[b] If there are no independent methods that are utilized to determine that the data provided by EXFC reporters is accurate, so state.

[c] Are there any changes between the wording shown above which is from USPS-LR-K-127 and the corresponding paragraph in the current USPS-LR-L-134?

[d] If so, please advise the changes.

DBP/USPS-394

Please refer to your response to Interrogatory DBP/USPS-189.

Section D.9 of the EXFC SOW requires that the supplier validate the accuracy of the reporter data and also indicates that the USPS may independently conduct tests of report accuracy as noted below:

#### D.9 Reporter Data Accuracy

The supplier must validate the accuracy of reporter data and the USPS COR must receive information confirming this validation process.

The USPS may independently conduct tests of reporter accuracy. The supplier must fabricate sufficient additional test mail to test two reporters per postal quarter in each of the EXFC Performance Clusters upon USPS request. This test mail will not be used to measure service performance. The supplier shall also produce a report summarizing these results upon request.

[a] Please advise which specific words in the referenced response indicate the procedures that are utilized to ensure that the data provided by EXFC reporters is accurate,

[b] Please advise which specific words in the referenced response indicate the procedures that are utilized by the USPS to independently ensure that the data provided by EXFC reporters is accurate,

#### C.3 Responsibilities

**On the day each test mail piece is received, reporters are required to write the date of receipt on the portion of the test piece that includes the test piece identification. Reporters must call the supplier within 24 hours of receipt to report the test mail. After the reporters call in the receipt information, they must place all insert sheets back into the correct test envelopes. Reporters must retain EXFC test mail pieces for at least 60 days.**

**Reporters must notify the supplier if they are unable to receive mail for any reason. Such reasons may include vacation, illness and destruction of mailboxes. The reporter response rate must be at least 90%.**

**Boxholder reporters must supply the posted box mail available time to the supplier.**

[c] If there are no independent methods that are utilized to determine that the data provided by EXFC reporters is accurate, so state.

DBP/USPS-395 Please refer to your response to Interrogatory DBP/USPS-190.

Your response stated:

**RESPONSE:**

While the Postal Service has not explored these postulated options, it is probably safe to confirm that they may be possible.

Please explain why it was necessary to not provide an unconditional confirmation of the postulated option.

DBP/USPS-396 Please refer to your response to Interrogatory DBP/USPS-191.

This Interrogatory does not postulate any particular way of counting the days to delivery. It asks two specific questions and then asks for actual percentages for a recent period.

[a] Please respond to the original Interrogatory.

[b] With respect to subpart a of Interrogatory DBP/USPS-70, please confirm, or explain if you are unable to confirm, assuming no non-delivery days are involved, that very little [probably well less than 10%] of the mail that is destined to a 2-day delivery area will be delivered overnight.

[c] With respect to subpart a of Interrogatory DBP/USPS-70, please confirm, or explain if you are unable to confirm, assuming no non-delivery days are involved, that a small amount [probably well less than 20%] of the mail that is destined to a 2-day delivery area will be delivered in 3 or more calendar days since it would not have achieved timely delivery.

[d] With respect to subpart a of Interrogatory DBP/USPS-70 and your response to subparts b and c of this Interrogatory, please confirm, or explain if you are unable to confirm, assuming no non-delivery days are involved, that at least 70% of the mail that is destined to a 2-day delivery area will be delivered in 2 days.

[e] Please confirm, or explain if you are unable to confirm, that the delivery standards are established that mail destined to the overnight area will be scheduled for delivery overnight and achieve it some 95% of the time.

[f] Please confirm, or explain if you are unable to confirm, that the delivery standards are established that mail destined to the 2-day delivery area will be scheduled for delivery on the second day assuming no non-delivery days and achieve it some 90% of the time.

[g] Please confirm, or explain if you are unable to confirm, that the delivery standards are established that mail destined to the 3-day delivery area will be scheduled for delivery on the third day assuming no non-delivery days and achieve it some 90% of the time.

[h] Please confirm, or explain if you are unable to confirm, that if mail was consistently being delivered on a day other than the service standards would indicate [assuming no non-delivery days are involved] then the service standards would be changed.

DBP/USPS-397 Please refer to your response to Interrogatory DBP/USPS-192.

[a] Please confirm, or explain if you are unable to confirm, that the method of counting days provided in Section D.3 of USPS-LR-L-134 will introduce a certain amount of inaccuracy due to the effect of non-delivery days.

[b] Please confirm, or explain if you are unable to confirm, that the possible method of counting days provided in Interrogatory DBP/USPS-69 will introduce a certain amount of inaccuracy due to the effect of non-delivery days.

[c] Please confirm that the response to subpart a above will be a greater inaccuracy than the response to subpart b above.

DBP/USPS-398 Please refer to your response to Interrogatory DBP/USPS-193.

[a] Please confirm that the page reference should be 14 and not 13.

[b] A response was not received to subpart b of Interrogatory DBP/USPS-193. Please respond.

[c] Does IBM select boxes remotely in a manual method or do they have a computer program to effect the random selection.

[d] Please discuss the method utilized as provide in the response to subpart c above.

DBP/USPS-399 Please refer to your response to Interrogatory DBP/USPS-200 subparts g and h.

[a] Please confirm, or explain if you are unable to confirm, that the DW will be the same whether the tire [or other similar shape] is filled in or is open such as noted in the original response.

[b] Please confirm, or explain if you are unable to confirm, that the DW of a tire-shaped parcel with a diameter of 90 inches and a circumference of the cross section equal to 12 inches [the parcel would be mailable since the length plus girth would be 102 inches or less

than the 108 inch limit] would be 132 pounds  $[90 \times 90 \times 4 [12 \text{ divided by pi and then rounded off}] \times 0.785 \text{ divided by } 194]$ .

[c] What rate would the parcel described in subpart b have if it was destined to the 8th zone? Please describe how the rate was determined.

[d] Please indicate how rates will be determined for parcels that have a DW of greater than 70 pounds.

DBP/USPS-400 Please refer to your response to Interrogatory DBP/USPS-200 subpart i.

[a] Please confirm, or explain if you are unable to confirm, that the DW will be the same whether the tree [or other similar shape] is sent in a container with a uniform circular section with a circumference equal to the maximum of the root area of 30 inches or is open such as noted in the original response.

[b] Please confirm, or explain if you are unable to confirm, that the shipment of a conical shaped parcel would be the extreme of this condition.

[c] Please confirm or explain if you are unable to confirm, that a conical shaped parcel with a height of 40 inches and the circumference at the base of 63 inches and a circumference at the top of the cone would effectively be 0 inches would have a DW of 65 pounds.

[d] Please confirm, or explain if you are unable to confirm, that if the tree or conical shaped parcel was shipped in an open manner that other parcels could possibly extend into the open volume.

[e] Please confirm, or explain if you are unable to confirm, that irregular parcels could have a large increase in the required postage due to the imposition of the DW proposal. For example, compare the rates for a light-weight tire shaped parcel with a length plus girth of less than 84 inches. A parcel with a diameter of 71 inches and a circumference of the cross section of 12 inches and an actual weight of 3 pounds [and chargeable at this rate under the current rates since it is less than 84 inches length plus girth] would have a DW of 82 pounds

DBP/USPS-401 Please refer to your response to Interrogatory DBP/USPS-200. For each of the examples of DW that was calculated for the sample parcels in subparts a through I, please provide the calculation that would be made to show the volume of the parcel so as to determine if it exceeded the 1 cubic foot and therefore would have the DW procedure applied to it.

DBP/USPS-402 Please refer to your response to Interrogatory DBP/USPS-201.

[a] The original request asked for data broken out in one ounce increments [0 to 1 ounce, 1 to 2 ounces, 2 to 3 ounces, .... , 12 to 13 ounces] for weights up to 13 ounces. Please provide a revised chart showing the requested data.

[b] Please advise the weight of an empty flat rate envelope and if it is over one ounce, please explain how there could be any data in the 0 to 1 ounce category.

[c] Given that a ream of paper weighs over 5 pounds and that much paper would likely not all fit into a flat rate envelope, please discuss why the data for 6 pounds and above [some 1+ percent of the total] is reliable.

DBP/USPS-403 Please refer to your response to Interrogatory DBP/USPS-176. Please evaluate your response to the original Interrogatory. Both lists appear to have the same 463 3-digit ZIP Code prefixes. Both lists appear to be entitled or relate to EXFC ZIP Codes. The list in the Library Reference has 11 Areas and the attachment to DBP/USPS-55 has only 9 Areas and appears to be the updated for the Area consolidations. The referenced Richmond District is now in the Cap Metro Area rather than the form Midatlantic Area. The list attached to Interrogatory DBP/USPS-55 appears to be the later list although the following Districts appear to be in the wrong Area: Greater South Carolina, Greensboro, Mid-Carolinas, Arizona, and Nevada-Sierra.

Please respond to the original Interrogatory.

DBP/USPS-404 Please refer to your response to Interrogatory DBP/USPS-187 subpart a. Please confirm, or explain if you are unable to confirm, that mail must be collected from a blue collection box on or after the time posted on the box.

DBP/USPS-405 Please refer to your response to Interrogatory DBP/USPS-187 subparts b and c. Please confirm, or explain if you are unable to confirm, that in many areas of the country the Postmaster and/or his/her staff will set the time of many, most, or almost all of the blue collection boxes under their jurisdiction to the same time even though the collection will take more than 20 minutes and the later boxes will be collected more than 20 minutes after the time posted on the box. For example, a given District might mandate all of the boxes to have either a 1 PM weekday collection or to have both a 1 PM and 5 PM weekday collection and the time necessary to make the collection will exceed 20 minutes.

DBP/USPS-406 Please refer to your response to Interrogatory DBP/USPS-187 subpart d. What action would be taken with respect to the tallying of the involved mail

DBP/USPS-407 Please refer to your response to Interrogatory DBP/USPS-187 subpart e. You have indicated that IBM retrieves information from the CPMS database. Does the CPMS database that they utilize have all of the collection times of the day or only the last collection time of the day?

DBP/USPS-408 Please refer to your response to Interrogatory DBP/USPS-238.

- [a] Does the Postal Service believe that a 37.5% level of compliance is satisfactory.
- [b] Please provide the rationale for your response to subpart a
- [c] Please list and discuss the plans that the Postal Service has or will have to improve the level of compliance.

DBP/USPS-409 Please refer to your response to Interrogatory DBP/USPS-48 subpart b. The data in the OVNITE, 2DAY, and 3DAY columns is from PQ 2 FY 2005. Please update this information to the latest available quarter.

DBP/USPS-410 Please refer to your response to Interrogatory DBP/USPS-53. Please clarify the meaning of "[2709]" particularly with respect to the bracket.

DBP/USPS-411 Please refer to your response to Interrogatory 59 subpart b.

- [a] Please confirm, or explain if you are unable to confirm, that single-piece First-Class Mail utilized by consumers also includes small parcels weighing up to 13 ounces.
- [b] Please explain why EXFC does not measure small parcels sent by First-Class Mail.

DBP/USPS-412 Please refer to your response to Interrogatory DBP/USPS-83.

- [a] Please explain why you believe the volume of mail that is not received is so high.
- [b] Please list and explain what you believe happened to the pieces that were not reported as being received.
- [c] Please discuss what you believe the effect is on the overall EXFC reports due to the volume of unreported mailpieces.

DBP/USPS-413                    Please refer to your response to Interrogatory DBP/USPS-206. Please have the expert on Express Mail advise any reason[s] that he/she is aware of that would allow for one not to consider that the average price per Express Mail article would be the same for those articles that are delivered on time as compared to those that are not delivered on time.

DBP/USPS-414                    Please refer to your response to Interrogatory DBP/USPS-207. Please have the expert on Express Mail advise any reason[s] that he/she is aware of that would allow for one not to consider that the average price per Express Mail article would be the same for those articles that are not delivered on time and for which a claim for postage refund was filed as compared to those that a claim for postage refund was not filed for.

DBP/USPS-415                    Please refer to your response to Interrogatory DBP/USPS-214. Please describe in detail the method by which a mailer, utilizing just a scale and a ruler, will be able to determine the thickness of a mailpiece which does not have a uniform thickness throughout the entire area of the mailpiece and also which has a thickness which depends on the extent to which the thickness may be compressed or which expands after compression is released. If the determination of the thickness of the mailpiece will require any additional equipment besides the scale and ruler, so indicate.

DBP/USPS-416                    Please refer to your response to Interrogatory DBP/USPS-181 subpart b. What I am interested in are the various procedures that have been implemented to raise the EXFC for 84% in 1992 to the score of 95% in 2006. Items such as the following are the types of items that I would consider to be the type of response:

- [1] Blue collection boxes are scanned on collection
- [2] Missed collection boxes are collected after discovery of being missed
- [3] Missent mail is processed for delivery on the same day
- [4] Collection times are advanced to allow for an earlier arrival at the plant
- [5] The number of blue collection boxes has been reduced
- [6] Checks are made to ensure all mail collected is dispatched to the plant
- [7] Service Standards have been evaluated and changed when appropriate

Please provide the desired information.

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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 24, 2006

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