

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-483-487]

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."

August 11, 2006

Respectfully submitted,

R20061VV483

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

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DBP/USPS-483

Please refer to footnote 2 on page 6 of the Testimony USPS-T-38 revised on August 10, 2006.

Please confirm, or explain if you are unable to confirm, that under the revised proposed regulations for single-piece/nonpresort Bound Printed Matter [BPM] a mailer who is aware of the service will be able to prepare and deposit the mail in all of the same ways and conditions that it can be done under the present regulations.

DBP/USPS-484

Please refer to footnote 2 on page 6 of the Testimony USPS-T-38 revised on August 10, 2006.

Please confirm, or explain if you are unable to confirm, that under the revised proposed regulations for single-piece/nonpresort Bound Printed Matter [BPM] a mailer who is aware of the service will be able to obtain all of the extra/ancillary services that are available presently and be able to prepare and deposit the mail in all of the same ways and conditions that it can be done under the present regulations.

DBP/USPS-485

Please refer to footnote 2 on page 6 of the Testimony USPS-T-38 revised on August 10, 2006.

Please advise what assistance a mailer who is aware of the existence of the single-piece/nonpresort Bound Printed Matter [BPM] service will be able to obtain assistance from a retail service window as follows:

- [a] To determine the weight of the mailpiece.
- [b] To determine the zone for the mailing.
- [c] To determine whether the mailpiece is a flat or a parcel.
- [d] To determine the availability and cost[s] of any of the various ancillary services.
- [e] To determine the postage that would be required for a mailpiece having all of the characteristics and ancillary services as noted above.
- [f] To determine whether the contents of the mailpiece would qualify for mailing as BPM.
- [g] To obtain a PVI strip or other Postal Service issued postage validation to cover the required postage.
- [h] To purchase the necessary adhesive postage stamps to cover the required postage.
- [i] To provide any necessary markings or validations, such as a \$0.00 PVI strip, to ensure that the mailpiece will have the same level of mailpiece security for mailpieces that are over 16 ounces in weight that a mailpiece with a PVI strip paying the full postage would have.
- [j] To determine the service standards for the mailpiece.
- [k] Please explain and provide the rationale for any negative responses to subparts a through j above.
- [l] For each of the services listed in subparts a through j above, please provide the source of the information or action. For example, the weight of the mailpiece would be determined on the POS terminal scale.

DBP/USPS-486                      Please refer to footnote 2 on page 6 of the Testimony USPS-T-38 revised on August 10, 2006.

[a]     Please provide a complete listing of the assistance that a mailer [who is unaware of the BPM service] who has a mailpiece could receive information or assistance at the present time which would lead the customer to choose BPM for the mailpiece. Include assistance that could be provided at a retail window, from the 1-800 number, from a delivery carrier, etc.

[b]     Please indicate which, if any, of the information or assistance items shown in response to subpart a above will no longer be available if the proposed regulations are implemented.

[c]     Please provide the rationale for each of the items that will no longer be provided if the proposed regulations are implemented.

DBP/USPS-487                      Please refer to footnote 2 on page 6 of the Testimony USPS-T-38 revised on August 10, 2006.

[a]     Please provide the POS terminal screens and verbal exchanges that would match an exchange between a customer presenting a mailpiece [under the present regulations] and ultimately ending up choosing BPM.

[b]     Please provide the POS terminal screens that would be utilized after the proposed regulations are implemented.

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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     August 11, 2006

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