

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
Submitted 4/29/2005 9:35 am
Filing ID: 43796
Accepted 4/29/2005

Postal Rate and Fee Changes]
Pursuant to Public Law 108-18]

DOCKET NO. R2005-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-41-45]

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."

April 29, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528
R20051E

DBP/USPS-41 Please refer to your response to DBP/USPS-15 as it relates to delivery to post office boxes. In those offices that do not provide retail window services on a Saturday but do have post office boxes for mail delivery. [a] Is it required that customers have access to their box at a time after which Saturday's incoming mail has been placed into the box? [b] Is it required that post office box customers have the ability to pick up accountable mail and articles that are too large for the box on Saturdays? [c] Does this requirement also apply to every Monday through Saturday that is not an official holiday such as might occur on Thanksgiving Friday, Christmas eve, New Years eve, etc.? [d] Please explain any negative responses.

DBP/USPS-42 Please refer to your response to DBP/USPS-16 subparts c and d. [a] Is it permissible for a customer to mail an article and overpay the postage? For example, may I mail an article that requires \$10.00 in postage and pay for it by affixing a \$13.65 stamp? [b] If not, why not? [c] If so, please explain how it would be possible to determine, **with absolute certainty**, the amount of insurance that had been purchased.

DBP/USPS-43 Please refer to your response to DBP/USPS-25 subparts a and c. [a] Please breakdown the 2,329,666 failures into those that were scheduled for overnight delivery vs. those scheduled for delivery on the second day. If an accurate breakdown is not available, please provide the best estimate. [b] Please discuss the reasons that it is believed that 4.4% of the articles are not delivered on time and what steps are being taken to reduce that number.

DBP/USPS-44 Please refer to your response to DBP/USPS-25 subpart d. [a] In a past rate case this information was provided. Please provide the best estimate. [b] Please advise the total dollar amount of all refunds. [c] Please advise the average postage paid on an Express Mail article. [d] Please advise why dividing the two previous numbers would not provide a reasonable estimate as to the number of refunds that have been paid.

DBP/USPS-45 Please refer to your response to DBP/USPS-28. [a] How do you reconcile your response in light of DMM Section S915.1.4? [b] Please advise why a similar provision does not apply to other accountable mail particularly Express Mail where the label weighs approximately 1/4 of an ounce and could result in an additional \$4.40-\$4.45 in postage for an Express Mail article that went over the 8-ounce weight limit due to the weight of the label.

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 April 29, 2005
