

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

MOTION TO COMPEL RESPONSES TO INTERROGATORIES DBP/USPS-135-136 \\\
NOTIFICATION OF UNANSWERED INTERROGATORIES DBP/USPS 103, 104, AND

127[b]

April 22, 2000

Respectfully submitted,



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

1. I wish to file a Motion to Compel in response to the Postal Service's Objection to responding to Interrogatories DBP/USPS-135 and 136. As indicated in the response to DBP/USPS-4, there are or will be some 950 Mail Boxes Etc. [MBE] Contract Stations in operation. This number is a significant number of postal facilities in the country. Interrogatory DBP/USPS-135 inquires into the arrangements that exist in the MBE contract [Page 3 of USPS-LR-I-231] which allows these USPS Contract Stations to make additional charges over that which is listed in the DMM for "value added services" and "transaction of handling fees or charges". This interrogatory is attempting to find out the extent to which MBE Contract Stations have been authorized to charge rates over and above those that have been recommended by the Postal Rate Commission and approved by the USPS Board of Governors. Regular USPS facilities and non-MBE contract stations are only allowed to charge authorized rates. Why are MBE facilities special?

2. For example, I was charged \$1.80 by an MBE Contract Station to mail the 0.28 pound [4.48 ounce] letter yesterday containing the copies of my April 21, 2000 pleading to the USPS Law Department. Had I mailed the letter "normally" it would have only cost me \$1.21 postage. I am at a loss to understand the added 59-cents cost since the only transaction was to weigh the letter, take my \$2.00, give me 20 cents change and a

receipt, and hopefully affix postage to the letter and turn it over to the Post Office for delivery. What "value added services" and "transaction of handling fees or charges" could I have received for the extra 59 cents? This is **very relevant** to the rates and charges for all classes of mail deposited at a significant number of facilities and must be pursued and investigated.

3. I also note that the MBE Contract Station was not able to accept Priority Mail that had Delivery Confirmation associated with it.

4. Interrogatory DBP/USPS-136 relates to the level of service and therefore the value of service of a significant number of postal facilities.

5. The level of burden has not been specified and therefore may not be claimed.

6. A response has not been received to interrogatories DBP/USPS-103, 104, and 127[b] which were filed on March 23, 2000, over four weeks ago.

CERTIFICATE OF SERVICE

I hereby certify that I have this date 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 22, 2000


