BEFORE THE

POSTAL RATE COMMISSION

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WASHINGTON DC 20268-0001 HAY

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Postal Rate and Fee Changes, 2000]

DOCKET, NO. R2000-1 ALGEBRA

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE [DBP/USPS 218-227]

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. The instructions contained in my Interrogatories dated February 29, 2000, are incorporated herein. PLEASE EXPLAIN AND DISCUSS ALL INSTANCES WHERE IT IS NOT POSSIBLE TO CONFIRM THE DESIRED STATEMENT RATHER THAN JUST STATED THAT IT IS NOT CONFIRMED. If the witness does not have the expertise to provide an accurate response to the interrogatory, please refer it to a witness or USPS employee that does.

May 1, 2000

Respectfully submitted,

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

DBP/USPS-218 Please refer to the response to DBP/USPS-104. [a] Please read the last sentence of DMM Section S915.1.4 and then reanswer DBP/USPS-104. [b] Please confirm that once the postage has been determined based on the weight of the mail piece without the stamps or labels affixed and then the stamps and/or labels are affixed, it may not be possible for the Postal Service to determine that the article has the proper postage affixed.

DBP/USPS-219 Please refer to your response to DBP/USPS-170[b]. In the second example that you gave [retail window open until 5 PM / last dispatch at 4 PM], shouldn't the last dispatch be at 5 PM or later? If not, why not?

DBP/USPS-220 Please refer to your response to DBP/USPS-172. [a] Your response to DBP/USPS-172[a] keeps answering the question in reverse. My question is once a particular FIVE-digit ZIP Code is utilized for a one or more "No Office Point" address, is or will that same FIVE-digit ZIP Code be utilized for a NON-No Office Point address. The question does not, at least directly, relate to a change in status of a destination or to whether all of the No Office Points for Anchorage are in the 99695 ZIP Code. The question is attempting to determine is or will a given FIVE-digit ZIP Code be utilized for BOTH a No Office Point address and a NON-No Office Point. Examination of your attachment seems to indicate that it will, namely PO Box PML, Cold Bay AK 99571-8999 is a No Office Point and PO Box 1, Cold Bay AK 99571-0001 is a regular type of address - both of which use the same 5-digit ZIP Code 99571. Please clarify and explain. [b] Since this is an institutional interrogatory, please have the experts in Washington respond to DBP/USPS-172[i].

DBP/USPS-221 Please refer to your response to DBP/USPS-173. Please furnish a copy of the standard manifest form that is utilized which indicates the section for the code for return receipt being requested as noted in your specific response to DBP/USPS-173[e].

DBP/USPS-222 Please refer to your response to DBP/USPS-157[a-c]. [a] Please confirm that the reverse lookup referred to will require the window clerk to enter in the ZIP Code only and then print out the default city name, state, and ZIP Code in the top box of the receipt. [b] Please confirm that there are a number of ZIP Codes which may have two or more authorized city names that correspond to it. [c] What action will be taken if the city name that comes back from the reverse lookup does not match the city name shown by the mailer? [d] Will the article be scanned into the system at the time of mailing over the retail window? [e] If so, what use will be made of the data? [f] Will this change the capability of mailing Certified Mail without having to present it to a retail window clerk, such as mailing it in a collection box? [g] If so, please explain. [h] Will articles that are not handed in over a retail window still be scanned at the office of mailing?

DBP/USPS-223. Please refer to your response to DBP/USPS-158. [a] If a mailer were to make a change to the data on a return receipt that was received back in the mail [as indicated in the last sentence of your response to DBP/USPS-158[c]], could that potentially

affect the validity of the receipt as a legal document? Please explain your response. [b] What action should a delivery employee take if there was an error corrected at the time of completion of the return receipt to indicate that it was a proper correction?

DBP/USPS-224 Please refer to your response to DBP/USPS-159[b]. The question relates to whether a mailer may buy a return receipt that will specifically tell him the address at which the article was delivered [such as the service that was eliminated several years ago] as opposed to the present service which will, IF IT IS WORKING PROPERLY, tell the sender that the address is the same as utilized unless a new address is provided. Please reanswer the original interrogatory.

DBP/USPS-225 Please refer to your response to DBP/USPS-169. [a] Please explain what words on the card will advise the customer that one side of the card relates to mailing of tax returns and that the other side of the card provides GENERIC information on various special services? [b] Explain why you feel mailers will not be confused by the presentation of the material of specific tax mailing information on one side and generic information of a similar nature on the reverse side.

DBP/USPS-226 Please refer to your response to DBP/USPS-183[a]. Please provide any examples of the circumstances which would cause a delivering employee to report insured parcels to the accountable section before delivery.

DBP/USPS-227 Please refer to your response to DBP/USPS-186[I]. [a] Please comment on the validity of the data shown in this table since 10 of the 51 lines of data have more claims paid than articles that were sent at that given value level of insurance. [b] Please confirm that 11.1% of the parcels insured for \$2001-\$2100 resulted in claims for loss or damage. [c] Please confirm that 8.9% of the parcels insured for \$3001-\$3100 resulted in claims for loss or damage. [d] Please confirm that 4.8% of the parcels insured for \$1101-\$1200 resulted in claims for loss or damage.

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

May 1, 2000