

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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Postal Rate and Fee Changes, 2000]

DOCKET NO. R2000-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS 228-230]

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 8, 2000

Respectfully submitted,



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

DBP/USPS-228 Please refer to the response to DBP/USPS-103. [a] Please provide a breakdown by one ounce weights showing the total volume of Express Mail in each of the one ounce categories from one ounce to 32 ounces. [b] Provide an indication of the percentage of EP-13A envelopes [the non-flat rate cardboard envelope] utilized vs. the percentage of EP-13F envelopes [the flat rate cardboard envelope] utilized. If this data is not available for articles that are actually mailed, provide a breakdown of EP-13A vs. EP-13F envelopes that were shipped to the field in a recent approximately one year period or if that is not available, the number that were purchased in a similar period. [c] Confirm that quantity shipped to the field or purchased would serve as a reasonable proxy for their use in mailing.

DBP/USPS-229 Please refer to the response to DBP/USPS-127. [a] Please provide a legible copy of the front and back of both the EP-13A and EP-13F envelopes. Please indicate any color differences between the two envelopes. [b] Please confirm that articles

mailed in an EP-13A envelope will require postage based on the weight of the article and those mailed in an EP-13F envelope will require the two pound postage regardless of the weight of the article. [c] Since I have not seen the flat rate envelope in some time, is there still widespread distribution of the EP-13F envelope? [d] Please advise the steps that have been taken to ensure that both the mailing public and acceptance employees will not be confused by having two similar, but yet different, envelopes.

DBP/USPS-230 Please refer to the response of USPS Witness Robinson to questions posed during oral cross examination [Tr. 7/2897]. [a] Please confirm that, in general, the retail window acceptance clerks knowledge of overnight vs. 2-day vs. 3-day service commitments for both First-Class Mail and Priority Mail will be limited to that which is available to them on their retail terminals. [b] Confirm that the mileage for Local/Zone 1 is up to 50 miles. [c] Confirm that the Local Area may not always be committed for overnight delivery as may occur with military post offices, in Alaska, and possibly other remote locations. [d] Confirm that Zone 2 is 51 to 150 miles. [e] Confirm that Zones 3-8 is over 150 miles. [f] Confirm that the Zone charts, and therefore the Zone that a particular ZIP Code pairing will have is based on an area larger than a single 3-digit ZIP Code origin. For example, my Zone Chart indicates that it may be used for parcels originating in ZIP Codes 070-076, 079, 090-104, 110-113, and 116. [g] Does the same combining of groups of ZIP Codes exist on the destinating end. For example, will all of the ZIP Codes noted in subpart f above always be in the same Zone from some other point in the country? [h] Please confirm, that while mileage may have a general effect of service commitments it is only one point out of many that is utilized. [i] My objected to interrogatory DBP/USPS-71 is appropriate at this point as a follow-up interrogatory to this response in order to show the methods by which service commitments are actually determined and therefore, I ask it again as a follow-up interrogatory at this point. [j] Please confirm that the misleading data that is provided by these systems will cause mailers to make inappropriate decisions as to whether or not to utilize Express Mail vs. Priority Mail vs. First-Class Mail.

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 8, 2000

