

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

RECEIVED
May 18 8 10 AM '00

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 240-243]

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 15, 2000

Respectfully submitted,



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

DBP/USPS-240 Please refer to your response to DBP/USPS-196. I am not able to reconcile your response to DBP/USPS-196[d]. The first sentence indicated your confirmation that the revenue received for the 91.2% of the articles delivered by the guaranteed time would be reasonably close to 91.2% of the total revenue. This would be equivalent to stating that the revenue received for the 8.8% of the articles that were not delivered by the guaranteed time would be reasonably close to 8.8% of the total revenue. Your response to DBP/USPS-196[b] stated that the total revenue for the given period was \$1,055,104,000. 8.8% of that number would be \$92,849,152. The second sentence of your response stated that the estimated revenue from the 5,520,033 pieces which were not delivered on time is \$75,624,452. Please clarify, explain, and discuss the difference between these two numbers - \$92,849,152 is some 22.8% greater than \$75,624,452.

DBP/USPS-241 To clarify the last clause of my original DBP/USPS-196[d] and your response in which you stated it was not clear, please confirm that percentage of late

deliveries for which the senders who are entitled to file a claim for delivery after the guaranteed time actually do file a claim for refund of postage would be \$1,317,605 [your response to DBP-USPS-196[c]] divided by \$75,624,452, \$92,849,152, or by the number you arrive at in your response to DBP/USPS-240 [of course, the fraction obtained would be multiplied by 100 to arrive at a percentage value]. If you are not able to confirm, please explain and discuss why this ratio would be any different than the similar confirmation made in response to DBP/USPS-196[d] and provide your best estimate of the appropriate value and your reasons for arriving at that response.

DBP/USPS-242 This is to clarify my original DBP/USPS-196[f] based on your response that it was not clear. Based on your response to DBP/USPS-196 and my statements in DBP/USPS-241, it would appear that senders are not filing for entitled to refunds of postage in approximately 98-99% of the Express Mail articles that are delivered late after the guaranteed time. Please confirm that this large number includes senders who are not aware that the article was delivered after the guaranteed time, the sender was not aware of the ability to obtain a refund, or did not believe that it was worth making the effort to obtain a refund. Please also explain and discuss any other reasons you feel may also apply and why you believe that only 1-2% of those senders who are entitled to apply for a refund of postage actually do so.

DBP/USPS-243 Based on the high percentage of senders who do not file for refunds, please explain the methods by which the Postal Service makes senders aware of the ability to apply for a refund if the article is not delivered by the guaranteed time.

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 15, 2000

