

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  
OF THE SECRETARY

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES  
POSTAL SERVICE [DBP/USPS 244-246] AND MOTION FOR LATE ACCEPTANCE [IF  
NECESSARY]

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.

To the extent that a Motion for Late Acceptance of these Follow-up Interrogatories may be required, I so move. I was away on a vacation and business trip from May 18 to 24, 2000. No party, other than myself, should be prejudiced by this delay.

May 26, 2000

Respectfully submitted,



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

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DBP/USPS-244 Please refer to your response to DBP/USPS-220[b]. The response to DBP/USPS-172[i] has not been received. Please provide.

DBP/USPS-245 Please refer to your response to DBP/USPS-227. [a] The third sentence of your response to subpart a states that both the fee and postage are included in the claim amount. Please refer to DMM Section S010.3.2 and reanswer the question. [b] Please confirm that the FY 1998 claims that were for articles mailed in FY 1997 would be pretty much balanced by the articles mailed in FY 1998 that resulted in claims processed in FY 1999. [c] Please correct my original subpart d to \$1001-\$1100 and reanswer. [d] To

compensate for the claims volume higher than expected for value levels \$100 above those value levels with a high number of transactions, confirm that placing the data into \$500 brackets ending at the value \$100 above the high number of transactions entry, such as \$1601-\$2100 would provide a more realistic picture of the data.

DBP/USPS-246. Please refer to your response to DBP/USPS-212[b]. Your response seemed to ignore the word "eligible" before Fee Group E individuals. These are individuals who are entitled to a free Group E box and yet are being charged box rents. Please reanswer the question. Any DMM references should provide specific citations.

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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 26, 2000

