

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate and Fee Changes, 2001]

RECEIVED
JAN 4 12 31 PM '02
DOCKET NO. R2001-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-139-140]

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 the interrogatories DBP/USPS-1-82, dated November 26, 2001, are incorporated herein by reference.

January 4, 2002 Respectfully submitted,

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

DBP/USPS-139 Please refer to your response to DBP/USPS-92. [a] With respect to the unzoned Priority Mail rates that presently exist for weights up to 5 pounds, [1] have these rates been popular since they were established? [2] to what extent do competitors offer a similar unzoned rate structure? [3] to what extent do these unzoned rates provide simplicity, as well as convenience to the Postal Service? [4] to what extent do these unzoned rates provide simplicity, as well as convenience to the user? [5] to what extent do these unzoned rates help the Postal Service's position in the market? [b] Do your answers to subpart a apply equally to weights between 1 and 5 pounds as they do to weights up to 5 pounds? If not, explain any difference.

DBP/USPS-140 Please refer to your response to DBP/USPS-102. [a] Please confirm, or explain if you are not able to do so, that, in general, the costs to the transportation carrier will increase based on the distance the article is transported. [b] Provide any reasons why you believe that FedEx's costs do not increase with the greater distance the article is transported. [c] Please confirm, or explain if you are not able to do so, that the rates that FedEx and the Postal Service arrived at are based on FedEx's belief that a certain profile of distances that articles are transported will exist. [d] Please confirm, or explain if you are not able to do so, that the rates that FedEx and the Postal Service will arrive at in the future will be

based on FedEx's evaluation of the profile of distances articles are transported and will increase if there is an increase in the profile.

CERTIFICATE OF SERVICE

I hereby certify that I have this day 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 January 4, 2002
