

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

RECEIVED

Postal Rate and Fee Changes, 2001]

DOCKET NO. R2001-11
JAN 10 2 37 PM '02

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-141-155]

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 10, 2002 Respectfully submitted,

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

DBP/USPS-141 Please refer to your response to DBP/USPS-106 subpart a. [a] Please advise the expected date for dissemination of the communication. [b] What are the "usual internal communications channels" utilized?

DBP/USPS-142 Please refer to your response to DBP/USPS-109 subparts a-c. Please confirm, or explain if you are not able to do so, that there is no specific reference to the processing of return receipts.

DBP/USPS-143 Please refer to your response to DBP/USPS-111 subpart b. [a] Please advise the period of time after mailing that a return receipt after mailing may be obtained. [b] Please confirm, or explain if you are not able to do so, that the same delivery record data base will be utilized for both the return receipt after mailing requests and the electronic return receipt requests. [c] Why is the electronic return receipt request time being limited to a shorter period than the return receipt after mailing request time.

DBP/USPS-144 Please refer to your response to DBP/USPS-111 subpart c. Will mailers desiring a return receipt after mailing be advised that they may obtain the same information for a savings of \$1.95 by utilizing the electronic return receipt service? If not, why not?

DBP/USPS-145 Please refer to your response to DBP/USPS-112 subpart a. Please advise the expected date of completion of the operating procedures.

DBP/USPS-146 Please refer to your response to DBP/USPS-112 subpart b. Which specific lines of your testimony explain how you determined that the rate for return receipt after mailing obtained on the Internet will require a \$3.25 fee.

DBP/USPS-147 Please refer to your response to DBP/USPS-112 subpart c. Once again, I am looking for a **NARRATIVE** of the steps that the mailer and the postal employee will take in providing the return receipt after mailing service by each of the two methods. The narrative will take the form of words such as, "The window clerk will provide the mailer with Form 3811-A." Please provide the requested narrative.

DBP/USPS-148 Please refer to your response to DBP/USPS-105 subpart b. [a] Is this machine located at a USPS facility or at the addressee's facility? [b] Who is the owner of the machine? [c] Is the machine operated by an employee of the USPS or of the addressee? [d] Are the return receipts forms removed from the mailpieces by an employee of the USPS or of the addressee? [e] Are the return receipt forms in the constant view of the employee of the addressee from the time they are removed from the mailpiece until they are processed through the imprinting machine? [f] Is the machine under the control of the USPS or of the addressee? [g] Does the machine impression contain the name and location of the addressee's organization? [h] The sample impression is still desired.

DBP/USPS-149 Please refer to your response to DBP/USPS-105 subpart c. This interrogatory requested a listing of specific information. If the listing is not already compiled, I am still interested in receiving the requested information. Please provide.

DBP/USPS-150 Please refer to your response to DBP/USPS-99 subpart c. [a] This interrogatory subpart does not ask what the intention of the wording is; only what the wording states. Please respond to the question that was asked. [b] What is the intention of the wording? [c] Provide details on how a reader of the wording will be aware of the intention.

DBP/USPS-151 Please refer to your response to DBP/USPS-99 subpart h. [a] This interrogatory subpart does not ask what the intention of the wording is; only what the wording states. Please respond to the question that was asked. [b] What is the intention of the wording? [c] Provide details on how a reader of the wording will be aware of the intention.

DBP/USPS-152 Please refer to your response to DBP/USPS-99 subparts f and g. Please confirm, or explain if you are not able to do so, that delivery will be attempted prior to the scheduled delivery time at all of the referenced authorized types of addresses within the delivery area.

DBP/USPS-153 Please refer to your response to DBP/USPS-103 subpart c. I have measured a number of envelopes that I have in the 6-3/4 and 10 size and find that a number of them have a thickness of less than 0.009 inches [from 0.005 inches for an air mail type envelope to 0.006 inches for a window envelope at the window to 0.008 inches for a bond envelope to 0.0085 inches for a #10 envelope] in the thinnest part of the envelope [where there is only two layers of paper or where there is one layer of paper and one layer of window material or even where there is one layer of paper in the case of a window envelope without any window material]. Based on your response, it would appear that virtually all normal envelopes will require payment of the surcharge since there will be some small part of the envelope where there is no enclosure or perhaps the envelope is even being mailed without an enclosure. [a] Is this the intention to require payment of the nonmachinable surcharge as noted above? [b] Confirm, or provide the corrected thickness, that the thickness of the prestamped envelope sold by the Postal Service has a thickness of less than 0.009 inches when measured at a point where there is only two layers of paper [in a regular prestamped envelope] and where there is one layer of paper and one layer of the clear window material [in a prestamped window envelope].

DBP/USPS-154 Please refer to your response to DBP/USPS-103 subpart f. Please clarify your response. Would the "bulky key" as noted in your response still require the surcharge if it was firmly affixed to a piece of cardboard and the mailpiece still had a thickness of less than 0.25 inches?

DBP/USPS-155 Please refer to your response to DBP/USPS-122 subpart c and d. [a] Please provide a copy of the referenced Publication 431. [b] The requested procedures also

relates to the time period that the updates will be made, such as on an annual basis, prior to each omnibus rate case, etc. What time period is contemplated for updating the data?

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 10, 2002
