BEFORE THE

POSTAL RATE COMMISSION

WASHINGTON DC 20268-0001

Postal Rate and Fee Changes, 2001]

DOM RET NO3 R2001-1

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FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE [DBP/USPS-166-168]

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 28, 2002 Respectfully submitted,

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

DBP/USPS-166 Please refer to your response to DBP/USPS-146. My interrogatory is attempting to determine <u>why</u> you chose to have all categories of return receipt after mailing have a single fee based on a weighted cost rather than have those obtained on the Internet have a fee based on that cost while those that are not obtained on the Internet have a separate fee based on the associated cost. Please respond.

DBP/USPS-167 Please refer to your response to DBP/USPS-153. [a] Your initial sentence to the response appears to indicate the reason for applying the surcharge to flimsy pieces. Do you agree that the Postal Service must have a specific definition of "flimsy piece" so that the mailer will be able to determine whether or not the surcharge will apply? [b] If not, please explain how the mailer will be able to determine whether to include the surcharge fee on the postage affixed to the mailpiece. [c] I am somewhat confused by the apparent conflict between the response to DBP/USPS-103 subpart c which states that the surcharge will apply if <u>any part</u> of the envelope is less than 0.009 inches thick and the response to DBP/USPS-153 subpart a which states that the surcharge will not apply if the majority of the surface of the envelope is at least 0.009 inches thick. Please clarify and amend either or both answers, if appropriate. [d] Please clarify the use of the words "majority of the surface" in the response to subpart a of DBP/USPS-153. Does it mean over

50% or is there some other meaning? [e] Does the mailing of a #6-3/4 or #10 size envelope [noting the thicknesses as mentioned and confirmed in DBP/USPS-153] without any contents require the payment of the surcharge? Please explain your answer. [f] Does the mailing of a #6-3/4 or #10 size envelope with contents occupying 50% or less of the total area [such as might occur in mailing a stamped card in a #10 size envelope] require the payment of the surcharge? Please explain your answer. [g] Many stamp collectors obtain special postmarks, either on a handback method or through the mail, without the use of an enclosure in the envelope. Will this now require payment of the surcharge? Please explain your answer.

DBP/USPS-168 Please refer to your response to DBP/USPS-154. Please clarify how a mailer of a key with a plastic head firmly affixed to a piece of cardboard [but with the mailpiece still having a thickness of less than 0.25 inches] will know to pay the surcharge but a mailer of a key without a plastic head firmly affixed to a piece of cardboard will know that the surcharge is not required.

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 28, 2002