

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Classification and Fees
For Confirm

Docket No. MC2002-1

DAVID B. POPKIN
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-1-6]

Pursuant to Order No. 1339, I hereby submit interrogatories to the United States Postal Service. The instructions contained in the interrogatories DFC/USPS-1-18 in Docket C2001-1, dated May 19, 2001, are incorporated herein by reference. In accordance with the provisions of Rule 25[b], I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

Respectfully submitted,

May 3, 2002

David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

DBP/USPS-1 Please advise the approximate time between the time that the actual scan of a mailpiece is made and the time that the data will become available to the mailer.

DBP/USPS-2 Please provide information on the permissible locations on the mailpiece that the PLANET code may be placed.

DBP/USPS-3 Please confirm, or explain if you are unable to do so, that the decoding of the PLANET code is identical to that of decoding the POSTNET code for the individual digits as well as the check digit after switching the long and short bars. For example, a PLANET code of short-short-long-long-long is the digit zero.

DBP/USPS-4 On lines 9 to 16 of page 5 of USPS-T-2, there is a discussion of the data being reliable and consistent. [a] What level of reliability and consistency does the Postal Service consider to be acceptable? [b] What level of reliability and consistency is presently achieved? [c] If the response to subpart b is not equal to or greater than the response to subpart a, please explain the steps that will be taken to achieve the desired level and the time that it will be achieved by.

DBP/USPS-5 On page 8 of USPS-T-2, there is a discussion of the uses that the Postal Service will make of this program. [a] Please advise what steps the Postal Service will take to protect the privacy of the mailer's data. [b] What uses, if any, will the Postal Service make of information obtained from this program with respect to the destination of mailpieces from specific mailers? [c] Will the Postal Service make any use of the data with respect to the processing times of mailpieces that can be associated to a specific mailer? If so, please explain. [d] What access will the Postal Service have to the records that are associated to a specific mailer?

DBP/USPS-6 [a] Please explain the use, if any, that the Postal Service will make of this data to correlate with ODIS data for delivery performance. [b] Same as subpart a except for correlation with EXFC data. [c] Does Price Waterhouse utilize PLANET barcodes for their EXFC mail? [d] If so, please explain and provide information on the use made of the data.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

May 3, 2002

David B. Popkin