

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

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OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. 897

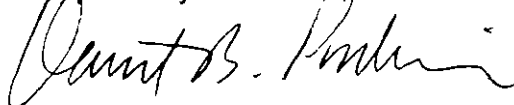
INSTITUTIONAL INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED  
STATES POSTAL SERVICE AND MOTION TO FILE ALL FOLLOWUP  
INTERROGATORIES / MOTIONS TO COMPEL IN A SINGLE PLEADING

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. Particularly since the Postal Service is encouraging cooperation from the intervenors, I request that similar cooperation in liberally interpreting the requests made by my interrogatories and provide the desired information. To reduce the volume of paper, I have combined related requests into a single numbered interrogatory, however, I am requesting that a specific response be made to each separate question asked. To the extent that a reference is made in the responses to a Library Reference, I would appreciate receiving a copy of the reference since I am located at a distance from Washington, DC. All responses should be complete without reference to any previous Postal Rate Commission dockets.

**In the event that the Postal Service does not respond to all of my interrogatories so that they are received on the same date or does not file responses within the required time or files an objection to any of my interrogatories, I request a waiver of the filing time rules which will allow me file all of my follow-up interrogatories that may be required or file a response to any USPS objection to my interrogatories at the same time in a single mailing made on the latest date as calculated for all of the USPS separate responses and pleadings.**

September 8, 1997

Respectfully submitted,



DBP/USPS-63 In the response to Question 1 in Presiding Officer's Information Request No. 2, it was stated that, "Our conclusion is that Library rate costs, like Classroom, suffer from some instability due to the small volume and the nature of the IOCS sampling procedures." [a] Describe the IOCS method of obtaining cost data. [b] Quantify and explain the words "some instability" as they were utilized in that response. [c] Explain and quantify what is meant by the "nature of the IOCS sampling procedure." [d] What other classes or subclasses of rates have similar or greater levels of instability and quantify and explain the amount. [e] Specifically what level of instability existed in the data for Special Handling, Return Receipt for Merchandise, stamped envelopes, Certified Mail, Registered Mail, and Return Receipt service. [f] For each of the different classes and subclasses of rates [including those mentioned in subpart e] for which the IOCS is utilized to provide cost data, furnish a listing of the class or subclass, the IOCS results for that class or subclass, the conversion of the IOCS data to actual costs, the reliability of the data, and the range of actual costs and cost coverage percents that would result based on the reliability of the IOCS data. The reliability should be expressed in a manner similar to a political poll when it states candidate A is leading candidate B by a 50 to 40 percent margin and the data is accurate to plus or minus 4 percentage points. [g] Explain the method utilized to calculate the reliability.

DBP/USPS-64 Refer to interrogatory DBP/USPS-27. [a] With respect to the new Return Receipt service showing the new address of delivery, has Headquarters or any Area prepared a training course or other training material to explain the new service? [b] If so, provide copies of the training material. [c] If not, add that reason into your response to subpart f of DBP/USPS-27.

DBP/USPS-65 Refer to interrogatory DBP/USPS-35 and in your responses to subparts b and c specify the locations of the facilities that presently do not have 100% capability to "trap" Certified Mail.

DBP/USPS-66 Refer to interrogatory DBP/USPS-54 which relates to stamped envelopes. [a] If you arrive at a price for any of the following types of envelopes in response to the following subparts of DBP/USPS-54, explain how that price was arrived at utilizing the data which is provided in the specific Fee Schedule for stamped envelopes: subparts d, e, k, and w. [b] Confirm, or explain if you are unable to do so, that the Postal Service issued a "G" rate stamped envelope which was prepared in advance of the last case and was sold with a postage value of 32 cents. [c] Will there be an "H" rate, or other designation, stamped envelope prepared in advance for use with the rate approved in the current case? [d] How many colors will be utilized to print the envelopes referred to in subpart c?

DBP/USPS-67 With respect to undeliverable-as-addressed First-Class Mail, [a] are there any service standards for the time taken to markup and return the mail to the sender? [b] If so, what are they?

DBP/USPS-68 Confirm, or explain if you are unable to do so, that the following types or categories of stamps have been issued by the United States Postal Service, or any of its predecessors [this does not include non-postage stamps issued by other government agencies], [a] postage stamps, [b] Air Mail stamps, [c] Special Delivery stamps, [d] Air Mail - Special Delivery stamps, [e] Registration stamp, [f] Certified Mail stamp, [g] Postage Due stamps, [h] Parcel Post stamps, [i] Special Handling stamps, [j] Parcel Post - Postage Due stamps, [k] Newspaper / Periodical stamps, [l] stamps with service endorsements for the various First-Class Mail categories, [m] stamps with service endorsements for the various Standard Mail or the former third-class mail categories, [n] stamps which have been precancelled by a means other than with a service endorsement only, [o] Official Mail or Penalty Mail stamps. [p] List

any other types or categories of stamps that have been issued. [q] With respect to each of the categories listed in subparts a through p, advise the use that may be made of these stamps by an individual mailer. Only consider stamps issued since 1860. If possible, limit your response to one or more of the following responses: 1. for all postage and fees, 2. for all postage but not for any fees, 3. for only the fee for the category shown on the stamp, 4. for use by the USPS only, 5. for use by an authorized government agency only, or 6. no use may be made. If a permit is required for their use, so indicate. If there is any restriction to use in international and/or domestic mail, so indicate. [r] If there is a stamp which may only be used to pay the fee for a special service and that service is eliminated or reduced by the Postal Service, such as was done with Special Delivery in a recent PRC Docket, what happens to individuals who are holding those stamps? [s] May they be redeemed or exchanged for ordinary postage stamps? [t] May they be utilized for the payment of any postage or fee? [u] If your response to subparts s and t is no, then explain why you feel that this would not be a taking of property by the Postal Service without compensation.

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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

  
September 8, 1997