

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

DAVID B. POPKIN INTERROGATORIES TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-150-156]

April 5, 2004

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,

April 5, 2004

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

DBP/USPS-150 Please refer to your response to DFC/USPS-T1-24 for the attached Policy For Requesting a Service Standard Change. In the third bullet under General Information, please provide examples of valid reasons which would support and justify the necessity of making a change in delivery standards.

DBP/USPS-151 [a] Please refer to your response to DFC/USPS-T1-24 for the attached Policy For Requesting a Service Standard Change. In the fourth bullet under General Information, confirm that in the example given, mail originating in the 212 area would be processed in the same physical plant as mail originating in the 210-211 area. [b] Please confirm that the isolation and separate processing would have to apply to all categories and classes of mail. [c] Please explain any items you are not able to confirm. [d] Please provide a listing of all facilities [including the ZIP Codes involved] where such isolation and separate processing exists and explain the reasons for the separation.

DBP/USPS-152 Please refer to your response to DFC/USPS-T1-24 for the attached Policy For Requesting a Service Standard Change. In the fourth bullet under General Information, confirm, or explain if you are not able to do so, that in the example for destinating ZIP Codes the different standards will apply for an entire 3-digit ZIP Code prefix, in other words, there are no destinating standards that apply differently within the same 3-digit ZIP Code prefix.

DBP/USPS-153 [a] Please refer to your response to DFC/USPS-T1-24 for the attached Policy For Requesting a Service Standard Change. [a] Please confirm that the current version does not contain the "suggestion" that "In most cases, changes requested between origins and destinations involving either 2- or 3-day service standards should include consideration of the entire destination ADC service area." that was contained in the April 1996 version. [b] Please explain the reasons why this "suggestion" was eliminated.

DBP/USPS-154 [a] Please refer to your response to DFC/USPS-T1-24 for the attached Policy For Requesting a Service Standard Change. [a] Please confirm that the current version does not contain the "requirement" in Submission Requirements subpart g that the request "reflects Operating Plan and transportation connectivity, or lack thereof." as well as the documentation that must be provided for either upgrades or downgrades that was contained in the April 1996 version. [b] Please explain the reasons why this "requirement" was eliminated.

DBP/USPS-155 [a] Please refer to your response to DFC/USPS-T1-24 for the attached Policy For Requesting a Service Standard Change. Please advise any other differences between the April 1996 version and the current version other than those referenced in the two previous interrogatories. Please explain the reasons for these changes.

DBP/USPS-156 [a] Please refer to your response to DFC/USPS-T1-24 for the attached Policy For Requesting a Service Standard Change. In the fourth bullet item on

the final page it refers to a change resulting in a political inquiry. Are political inquiries given a greater or lesser consideration than a similar inquiry from a member of the public. Please explain your answer.

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 and the order authorizing Electronic Service for this Docket.

April 5, 2004

David B. Popkin