

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

EXPERIMENTAL PRIORITY MAIL
FLAT-RATE BOX, 2004

Docket No. MC2004-2

DAVID B. POPKIN
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-T3-1 - 6]

June 24, 2004

I hereby submit interrogatories to the United States Postal Service. The instructions contained in the interrogatories DFC/USPS-1-18 dated May 19, 2001, are incorporated herein by reference.

Respectfully submitted,

June 24, 2004

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

MC20042F

DBP/USPS-T3-1 Please refer to Page 2 of USPS-LR-2/MC2004-2 and advise the proper volume for Phoenix AZ.

DBP/USPS-T3-2 [a] Please refer to Pages 1 and 2 of USPS-LR-2/MC2004-2, please provide specific details on how the sample sites were chosen. [b] Please confirm, or explain if you are not able to confirm, that there are no locations in the continental United States [lower 48 states] that are within the 8th Zone for the Kansas City and Wichita sites. [c] Do you believe that this had an effect on your study? Please provide your reasons for this belief.

DBP/USPS-T3-3 Since you only utilized 5,368 sample pieces, please describe in detail the sampling procedure that you utilized at each of the sites.

DBP/USPS-T3-4 You indicated that you recorded the dimensions of the sample piece by recording either the length, width, and height OR the length and girth. Please indicate how you were able to determine the volume of a sample parcel if you only knew the length and girth.

DBP/USPS-T3-5 In your testimony, you provide six Tables. [a] Table 1 is designated Zones 1-3. Does this also include local mail? [b] If not, where was local mail tabulated? [c] There are a total of 2100 cells in all six tables. This provides an average of only 2.56 parcels per cell. While I realize that all cells are not equally populated, please provide copies of the six Tables showing the number of samples in each of the 2100 cells.

DBP/USPS-T3-6 In the six tables, you show 70-pound parcels that have a volume of between 0.1 and 0.2 cubic feet. This would provide a density of over 345 pounds per cubic foot. Did your study contain records which indicate parcels which did not likely exist such as this example? If so, please explain why these records were not removed. If not, please explain.

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.

June 24, 2004

David B. Popkin