

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-T1-11 - 16]

July 13, 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,

July 13, 2004      David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

MC200421

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DBP/USPS-T1-11      In your response to DBP/USPS-T1-2 subpart b, you indicated that other participants in the preparation of this Docket expressed a concern about the confusion between using the flat-rate box and the lower non-flat-rate postage option. In response to subpart c you indicated that the details of these concerns was provided in section IV(B) of your testimony. Which specific lines of your testimony provide the details?

DBP/USPS-T1-12      Please refer to section IV(B) of your testimony. You indicate that it can be presumed that customers are rational economic agents who will act in their own best interests. While I can agree that sophisticated mailers will normally have sufficient information available to make an educated decision, my concern is with the non-sophisticated mailer. [a] Do you agree that there are mailers who may not have sufficient knowledge of the rate structure to make an educated decision that will be in their own best interests? [b] Please explain your response to subpart a. [c] Do you believe that there is an obligation for the Postal Service to provide sufficient information to the users of the system to allow them to make an educated decision that will be in their own best interests? [d] If not, please explain your reasons for this belief. If so, please provide details of the methods that will be utilized by the Postal Service to fulfill this obligation.

DBP/USPS-T1-13            In your responses to DBP/USPS-T1-7 and 8, it appears to indicate that the studies relied only on the volume of the parcel and not with whether the particular parcel could have utilized either or both of the proposed flat-rate boxes. You indicate that parcels that can fit into the flat-rate box any not be representative of those that will actually migrate to the flat-rate box. [a] Please confirm, or explain if you are not able to do so, that there are parcels that have a volume of 0.34 cubic feet or less that could not utilize either or both of the flat-rate boxes primarily because of their size or shape. [b] How many of the boxes evaluated in the study that contain articles that would not be able to utilize either or both of the proposed flat-rate boxes could be considered as migrating to the flat-rate box? [c] If your response to subpart b is any number greater than zero, please explain how that piece could migrate to a flat-rate box. [d] Do you feel that the referenced calculation starting on line 18 of page 3 of your testimony would have been more accurate had it been limited to parcels that would fit into either or both of the proposed flat-rate boxes? Please explain your answer.

DBP/USPS-T1-14            You indicate that the sampling study was conducted from October 2002 to January 2003. [a] Please confirm, or explain if you are not able to do so, that this time period includes the holiday season. [b] Please advise the effect on the study by conducting it at this time of the year.

DBP/USPS-T1-15            Please refer to your response to DFC/USPS-5. Irrespective of the reason or reasons that the Postal Service may feel that issuance of a separate stamp in the exact denomination of the new rate might not be the best solution, are you stating that the Postal Service does not have the ability to issue stamps of any denomination? If so, please explain why not.

DBP/USPS-T1-16            In your response to DBP/USPS-T2-11 subpart i you indicate that customers who elect to use the flat-rate box will do so not by default or out of habit. [a] Please advise how customers, both sophisticated and non-sophisticated, will be able to intelligently make a volitional departure from well-established custom and utilize the flat-rate box when it will be to their advantage to do so. [b] Do you feel that it is a satisfactory condition for a customer to continue to utilize the weight- and zone-rate because they are not

aware of the new service option so long as they are no worse off than before? Please explain.

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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.

July 13, 2004

David B. Popkin