

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

EXPERIMENTAL PREMIUM
FORWARDING SERVICE

Docket No. MC2005-1

DAVID B. POPKIN
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-T4-1-9]

December 22, 2004

I hereby submit interrogatories to the United States Postal Service. The instructions contained in the interrogatories DFC/USPS-1-18 filed May 21, 2001, in Docket C2001-1, are incorporated herein by reference. Respectfully submitted,

December 22, 2004

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

MC20051F

DBP/USPS-T4-1 On pages 7 and 8 of your testimony, you describe your rationale in choosing the 6th zone as the most appropriate choice. [a] Please explain why you chose a single zone rather than allowing the customer to pay the 3-pound rate for the actual zone involved [plus the \$10 enrollment fee and \$2.85 weekly processing fee]. [b] Please confirm that a 3-pound Priority Mail article will cost between \$4.75 and \$8.55 depending on the zone and that the 7th and 8th zone would cost \$7.70 if a flat-rate box were chosen. [d] Please confirm that the Priority Mail flat-rate envelope would cost \$3.85 regardless of weight or zone.

DBP/USPS-T4-2 Please refer to Attachment C of your testimony as it relates to the Household Diary Study. [a] Please confirm, or explain if you are not able to do so, that the average household contained in this study will receive an average of 10.2 First-Class Mail letters with an average weight per piece of 0.681 ounces per piece and therefore an average total weight of First-Class Mail pieces of 0.434 pounds of mail. [b] What type of mail is included in the Package Services category that the average household receives 3 pieces every 10 weeks and that each piece has an average

weight of only 1.953 ounces. [c] Please explain how the average weight of a Package Services article is only 1.953 ounces. [d] What are the dimensions of the average Package Services mailpiece? [e] What percentage of the 23 pieces of First-Class and Standard Mail pieces that the average household will receive in a week will be a number #10 size envelope or smaller? [f] Do you believe, and please explain the reasons for that belief, that a Priority Mail flat-rate envelope will be able to comfortably hold the 23 pieces of First-Class and Standard Mail weighing 1.967 pounds as well as the one or two Periodicals articles that the average household will receive in a week?

DBP/USPS-T4-3 [a] Do the households that are tabulated in the 2003 Household Diary Study contain households that participate in home businesses? [b] Do the households that are tabulated in the 2003 Household Diary Study contain households that participate in non-profit or social activities? [c] Please provide data showing the categories of households that are included in the 2003 Household Diary Study. [d] Do you believe that the households that are utilized in the 2003 Household Diary Study are representative of the users of PFS? [e] Please provide the reasons for your response to subpart d. [f] What percentage of the households utilized in this Diary Study do you believe were temporarily away from their permanent address as noted on lines 13 to 16 of page 7 of your testimony. [g] What percentage of the 2.532 pounds of mail that the average household receives will be reduced by mail sent directly to the PFS users at their temporary location? [h] Please provide your reasons for that belief and explain why you still continued to utilize 2.532 pounds figure in your PFS study.

DBP/USPS-T4-4 On page 6 of your testimony you discuss the effect on Postal Service competitors. [a] What services do Postal Service competitors provide that are similar or related to PFS? Please indicate the general form of the service provided by the competitor and the cost for the service. [b] Have you studied the services provided by the competitors? [c] If not, why not? If so, what did you learn and did you utilize any of their activities in your proposal for PFS?

DBP/USPS-T4-5 Do you feel that PFS will provide a useful service to RV owners referred to on lines 4 to 6 of page 6 of your testimony? If so, please explain. If not, why not?

DBP/USPS-T4-6 Please explain why the competitors' services will not allow a customer to keep their current postal address [see lines 2 and 3 on page 6 of your testimony].

DBP/USPS-T4-7 On line 6 of page 6 of your testimony, you indicate that you believe that PFS should not impact any of these alternatives. [a] Please explain your reasons for this belief. [b] Do you also believe the reverse, namely, do you believe that the alternatives will impact PFS? Please explain your reasons.

DBP/USPS-T4-8 In your discussion on pages 7 and 8 of your testimony, you picked a number of north-south pairs that were representative of seasonal moves. [a] It would appear that 1400 miles seems to be a maximum value for a north-south seasonal move and therefore zones 7 and 8 would be less likely to occur. Please explain why you chose the relative maximum zone as the zone to utilize for PFS. [b] What percentage of PFS users do you believe will be making a north-south seasonal move vs. other users of the service such as students at school, individuals away on a job assignment, or any other category of PFS users? [c] How did you take the non-north-south users into account in determining the choice of zone 6?

DBP/USPS-T4-9 On page 11 of your testimony you utilized a financial impact of only 20% of the figure utilized by Witness Rothschild. Please explain why you reduced her testimony value by more than 80%.

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.

December 22, 2004

David B. Popkin