

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

EXPERIMENTAL PREMIUM
FORWARDING SERVICE

Docket No. MC2005-1

DAVID B. POPKIN
FOLLOW-UP INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-T1-84-85]

March 2, 2005

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,

March 2, 2005

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

MC20051S

DBP/USPS-T1-84 Please refer to your response to DBP/USPS-T1-82. Your response failed to respond to my original interrogatory. The level of "complication" of the product is up to the Postal Rate Commission to decide after evaluating the Postal Service's proposal and the comments of the intervening parties. I would like to propose on Brief that the wording of proposed DMCS Section 937.11 be modified to eliminate the reference to reshipment of mail which requires a scan upon delivery being sent Priority Mail postage due. In order to be able to accurately make this claim, the information requested in this interrogatory is needed. The Postal Service is the only party that has the information requested. Since this interrogatory is reasonably calculated to lead to the discovery of admissible evidence, I again request a response to DBP/USPS-T1-82.

DBP/USPS-T1-85 Please refer to your response to DBP/USPS-T1-83. Your response failed to respond to my original interrogatory. I would like to propose on Brief that the wording of proposed DMCS Section 937.31 be modified to eliminate the reference to making the request at the post office responsible for delivery to that customer's primary address. I am attempting to show that the interaction that takes place between the Gracie Station [a different station of the post office responsible for delivery to the customer's primary address] and the Village Station [the station that is responsible for delivery] of the New York,

NY post office would be done in a manner which would be no different than would be conducted between the Tampa, Florida post office [a remote location]. My belief is that the interactions would all be done by a means that did not require an employee of the Gracie Station to physically travel down to the Village Station but would be done in a manner, such as telephone, fax, or mail, which would exist equally between Tampa and the Village Station. The Postal Service is proposing to allow for termination or extension of PFS to be done without making a physical appearance to the post office responsible to the customer's primary address. However, the Postal Service is also proposing to not permit modification of the PFS service but to require the original service to be terminated and have the customer re-enroll in a new service. Furthermore, the Postal Service is requiring that enrollment or re-enrollment must be accomplished at the post office, including any stations or branches, responsible for delivery to the PFS customer's primary address. Therefore, an enrollment or re-enrollment in PFS would not only require an additional \$10 fee for re-enrollment for a change but would also require a physical appearance at the post office responsible for the PFS customer's primary address. If a customer established PFS to send the mail from New York City to Florida and then while in Florida found it necessary to change the address in Florida that they receive the mail or even to have to go to California directly from Florida, they would have to make a physical trip back to New York just to walk into the New York post office and present a new application. I would like to be able to show on Brief that this trip from Florida to New York City is unnecessary and completely inappropriate. The Postal Service is the only party that has the information requested. Since this interrogatory is reasonably calculated to lead to the discovery of admissible evidence, I again request a response to DBP/USPS-T1-83.

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.

March 2, 2005

David B. Popkin