

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
Submitted 5/2/2005 2:47 pm
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Postal Rate and Fee Changes]
Pursuant to Public Law 108-18]

DOCKET NO. R2005-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-47-49]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatory pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. To reduce the volume of paper, I have combined related requests into a single numbered interrogatory, however, I am requesting that a specific response be made to each separate question asked. To the extent that a reference is made in the responses to a Library Reference, I would appreciate receiving a copy of the reference since I am located at a distance from Washington, DC. Any reference to testimony should indicate the page and line numbers. 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."

May 2, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

R20051H

DBP/USPS-47 [a] Please confirm, or explain if you are unable to do so, that the Postal Service makes use of Registered Mail for its own internal use. [b] Please list the uses for Registered Mail that are made by the Postal Service for its own internal use. [c] Please provide a listing for the last five years of the number of internal USPS Registered Mail articles vs. the total Registered Mail volume. [d] Please discuss the effects that the internal USPS use of Registered Mail had on the cost studies that were made for this Docket for Registered Mail.

DBP/USPS-48 Please provide a spreadsheet for each of the past three years that shows the following data for Registered Mail:

[a] The declared value starting at the without insurance category, the \$0.01 to \$100.00 category, and each of the separate categories up to the \$24,000.01 to \$25,000.00 category.

[b] The number of pieces of mail in that category.

[c] The number of claims that were made for loss or damage in that category.

[d] The number of claims that were paid for loss or damage in that category.

[e] The total value of the claims that were paid in that category.

[f] Please discuss the differences between the numbers shown in subparts c and d above, namely, reasons why claims are made and not paid.

DBP/USPS-49

[a] With respect to Express Mail Post Office to Addressee service, please confirm that for each and every possible mailing point as shown in your response to DBP/USPS-21 and sent to each and every possible address as shown in your response to DBP/USPS-22 and mailed on every one of the 365 days of the year that it is possible to achieve insertion into the system, that the article will achieve attempted delivery in one of three categories, namely, delivery will be made on the calendar day after mailing, delivery will be made on the second calendar day after mailing, or delivery will be made on the third calendar day after mailing or later. [b] Please confirm that the addresses that will receive next calendar day delivery will be shown in a directory that is provided at the office of mailing. [c] Please confirm that next calendar day delivery will be made Monday through Saturday except holidays to all ZIP Codes shown in the directory regardless of the type of address, namely, city delivery, post office box, general delivery, rural delivery, and highway contract delivery. [d] Please confirm that next calendar day delivery will be made on Sunday and holidays only at those ZIP Codes that are shown in a listing of ZIP Codes that have street delivery and a separate listing of those that have post office box service and are shown as having transportation which would permit arrival for Sunday or holiday delivery and regardless of the type of physical delivery [city, rural, or highway contract]. [e] Please advise the number of offices that have Sunday/holiday street delivery and the criteria for inclusion or non-inclusion on this listing. [f] Please advise the number of offices that have Sunday/holiday post office box delivery and the criteria for inclusion or non-inclusion on this listing. [g] Please advise the total number of ZIP Codes that have delivery in the United States. [h] Please provide a complete listing of all possible scenarios where delivery will be made on the third calendar day after mailing. This listing can be made by generic descriptions [such as articles mailed on a Saturday prior to a

Monday holiday and sent to an address that is not on the Sunday/holiday list will receive delivery on Tuesday] or it can be made by reference to specific offices [such as Hyder AK 99923 has incoming mail only on Monday and Thursday]. [i] Please confirm that all other Express Mail not enumerated in subparts c/d and h will receive delivery on the second calendar day after mailing. [j] Please explain and discuss any subparts you are unable to confirm.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

David B. Popkin May 2, 2005
