

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate Commission  
Submitted 5/4/2005 11:08 am  
Filing ID: 43904  
Accepted 5/4/2005

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-50-53]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories 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 4, 2005

Respectfully submitted,

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

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DBP/USPS-50                      Please advise whether it is the current belief that the Postal Service needs to provide the mailing public with the ability to utilize Registered Mail and the reasons for this belief.

DBP/USPS-51                      Please advise what alternatives to Registered Mail exist both in the Postal Service and, to the extent known, with competitors. Please provide comparative costs if known.

DBP/USPS-52                    Please advise the extent the proposed increase in Registered Mail will have on the volume of Registered Mail over the next few years and the potential for a "death spiral" to the service of decreased volume leading to increased cost until it is impossible to maintain the service.

DBP/USPS-53                    Please provide a complete presentation of how the costs for Registered Mail are determined for both the current rates that were established in R2001-1 and the proposed rates in the current Docket. This should show each of the components of the total cost data such as Retail Window Acceptance took 2 minutes at \$25 an hour in R2001-1 and now takes 3 minutes at \$30 an hour in the current case.

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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 4, 2005

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