

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
Submitted 5/12/2005 1:20 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-55-67]

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 12, 2005

Respectfully submitted,

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

R20051Kint

DBP/USPS-55 [a] Please confirm that the small size stamps printed by an APC contain a rectangular barcode approximately 3/4 of an inch by 13/16 of an inch. [b] Please confirm than postage meters contain a similar barcode. [c] Please advise the data that is contained in this barcode. [d] Please describe all uses that the Postal Service makes of these barcodes in the handling and processing of the mailpiece. [e] Please advise what will happen to a mailpiece utilizing a small size APC stamp that has been printed offset to the left so that part of the left side of the barcode will not appear on the stamp affixed to the mailpiece. [f] Please explain any items you are unable to confirm.

DBP/USPS-56 Please refer to your response to DBP/USPS-13 subpart f. Please confirm, or explain if you are unable to do so, that the EXFC program also tests post cards.

DBP/USPS-57 Please refer to your response to DBP/USPS-13 subpart i. [a] Please elaborate on the meaning of "controlled conditions". [b] Please advise what notice is given to potential mailers under these conditions and if notice is not given, please explain why.

DBP/USPS-58 Please refer to your response to DBP/USPS-32 subpart a. Please reanswer the subpart if one is to assume that the mailer will obtain a postmark or validation of the mailing receipt in a similar manner that would be required in obtaining a Certificate of Mailing which has to be postmarked to have any validity. Please also add PS Form 3804 Return Receipt for Merchandise to the listing of other forms.

DBP/USPS-59 Please refer to your response to DBP/USPS-33 subpart c. Please confirm, or explain if you are unable to do so, that the mailer must fill in this name and address prior to mailing the article. Please also add PS Form 3804 Return Receipt for Merchandise to the listing of other forms.

DBP/USPS-60 Please refer to your response to DBP/USPS-35 subpart a. [a] Please confirm, or explain if you are unable to do so, that the payment at the retail window will be required for any part or all of the combined postage and fees for the mailpiece as opposed to just the fee. [b] If a mailer presents an accountable mailpiece at a retail window, are they able to get a postmarked or validated receipt? [c] If not, why not? [d] If a mailer presents an accountable mailpiece at a retail window on which the full postage and fees have already been paid for, under which conditions will the barcode be scanned and under which conditions will the barcode not be scanned? [e] Please explain the reasons for those examples in subpart d which will not be scanned.

DBP/USPS-61 Please refer to your response to DBP/USPS-38. [a] Please confirm that the CDrom shows Standard Mail delivery standards of 3 to 10 days and that all 50 states are shown. [b] Please confirm that the CDrom shows Package Services delivery standards of 2 to 9 days and that only the 48 contiguous states are shown. [c] Please confirm that the delivery standards in the 48 contiguous states for Package Services is equal to or better than the standard for Standard Mail. [d] Please advise why it is believed that this

similar condition [Package Services equal to or better than Standard Mail] would not also apply to locations other than the 48 contiguous states. [e] Please advise what studies have been made to show that 3 to 5 weeks is a realistic estimate of delivery time for Package Services to or from or within areas other than the 48 contiguous states. Please provide copies of the studies. [f] Please confirm that mailers will utilize this 35-day estimate in comparison to the times shown for Express Mail or Priority Mail in making a decision as to which service to utilize. [g] Please confirm that the maximum time shown for Express Mail or Priority Mail is 3 days. [h] Please explain any subparts you are unable to confirm.

DBP/USPS-62 Please refer to your response to DBP/USPS-39 subpart d. Are you stating that the APC computer screen does or does not show the guaranteed delivery time for Express Mail of course, assuming that the article would be deposited in the mail drop as would be necessary to meet that delivery time.

DBP/USPS-63 Please refer to your response to DBP/USPS-40. Please advise how the mailer would be permitted, in light of the current security criteria, to mail an article that weighs over 16 ounces and has the postage paid by postage stamps.

DBP/USPS-64 [a] Please provide the average cost of processing a Registered Mail claim. [b] Does the cost depend on the value of the claim? [c] If so, please provide the average cost for each value bracket.

DBP/USPS-65 Please refer to your response to DFC/USPS-22 subpart a. Please advise how the mailer will know of this capability.

DBP/USPS-66 Please refer to your response to DFC/USPS-24. Please advise the current criteria utilized by Mystery Shoppers.

DBP/USPS-67 Please refer to your response to DFC/USPS-27. [a] Please confirm, or explain if you are unable to do so, that the following criteria exist for evaluating the time for an EXFC test letter: [1] If the scheduled service standard time for the letter is a delivery date and the letter is delivered on that day, the EXFC tally will be that day. [2] If the scheduled service standard time for the letter is a non-delivery date and the letter is delivered on next available delivery date, the EXFC tally will be the time of the scheduled delivery standard.

[3] The only way that an EXFC letter could show a tally which was less than the scheduled delivery standard, such as a letter sent to a 3-day delivery area being tallied as 1 or 2 days, would be for the letter to be physically delivered in that time. [4] If the letter is not delivered by the scheduled service standard time and the day before the actual delivery day is a delivery date, the EXFC tally will be the time of the actual delivery. [5] If the letter is not delivered by the scheduled service standard time and the day[s] before the actual delivery day is[are] a non-delivery date, the EXFC tally will be the number of days to the first non-delivery day so long as it will not show delivery in less time than the scheduled delivery standard. [6] There are no arrangements of non-delivery days that would allow for the EXFC tally to show a time which was less than the scheduled delivery standard, namely, a letter sent to a 3-day area would not be tallied as being delivered in 1 or 2 days or a letter sent to a 3-day area would not be tallied as being delivered in 1 day unless it actually got delivered in that reduced time. [b] Are there any instances where a letter that is expected to be inducted into the system on, for example, a Wednesday, is physically deposited in the collection box on Tuesday? [c] If so, please explain. [d] Do the various criteria enumerated in subpart a apply to all other systems that are utilized by the Postal Service to measure the time of delivery of mail? [e] If not, please explain and provide details.

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 12, 2005
