

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
Submitted 5/16/2005 11:16 am
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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-69-72]

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 16, 2005

Respectfully submitted,

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

R20051Nint

DBP/USPS-69 Please refer to your response to DFC/USPS-6 subpart b. The average time of delivery for Next Day Service is shown as less than one day. [a] Please confirm, or explain if you are unable to do so, that the average time of delivery is calculated by adding up the total number of days that letters took to deliver and then dividing that by the total number of pieces. [b] In the calculation, did the Postal Service utilize calendar days or delivery days and explain the reason for the choice? [c] Please confirm, or explain if unable to do so, that the Postal Service uses the date of first attempted delivery rather than the date of actual delivery. [d] This would appear to indicate that there are a number of letters that were delivered in zero days [on the day of mailing]. Please confirm or explain and also please

advise the conditions under which same day delivery would take place and the types of letters that might be delivered on the same day. [e] Does the number of delivery days shown in the calculation utilize the 24-hour period from midnight to midnight or does it utilize the 24-hour period based on the guaranteed time of delivery. For example, a letter mailed on Monday to an overnight location with a 12 Noon guarantee and delivered at 2 PM Tuesday, does it count a one day since it was delivered on Tuesday or two days since it was delivered after the guarantee time on Tuesday? Please explain the reason for the choice. [f] How does the inability to deliver Express Mail on certain days of the week [such as Sunday and holiday] affect the response? [g] Please provide a breakdown from zero calendar days to four calendar days and then for five or more calendar days and show the percentage of letters delivered in each of the fifteen categories in the response to DFC/USPS-6 subpart b. [h] Are there any reasons known for the 74% increase in the time for Custom Design mail between 2003 and 2004.

DBP/USPS-70 Please advise any policy decisions that exist as to whether Express Mail should be delivered as early as possible or whether delivery may be made at any time prior to the guaranteed delivery time. For example, if an Express Mail article for me arrives at the Englewood Post Office on Wednesday afternoon with a guaranteed delivery time of Noon on Thursday, should it be delivered on Wednesday or Thursday or if it arrives early Wednesday morning with a guaranteed delivery time of Noon on Wednesday, should the carrier deviate from his route to deliver the mail as soon as possible rather than anytime prior to Noon?

DBP/USPS-71 [a] Please provide a listing of those post offices that Post Office-to-Post Office Express Mail may be accepted and the conditions for acceptance. [b] Does the list depend on where the letter originates [for example, it may be accepted for pickup at the Englewood NJ Post Office if it is sent from any place in the NY Metro Area but not if it is sent from other places in the country]? [c] Must the article be claimed at a service window during the hours that it is open? [d] If not, please explain. [e] Please advise how non-window hours on Saturdays affects the service guarantee. [f] Please advise how a mailer will know whether the post office that the article is being sent to has Saturday window hours? [g] Please advise how the mailer will know that the window hours at the post office of address will be after the 10 AM guarantee time for the service. [h] What percentage of the post offices in the country has window service on Saturday? Please also provide the data for each of the areas.

DBP/USPS-72

Please advise the validity of the various United States postage stamps that have been issued since 1860 for use in paying either postage or fees [for example, while a 15¢ Certified Mail stamp may not be used to pay the postage on a Certified Mail letter, may one or more of them be used to pay part or all of the Certified Mail fee] on a mailpiece. Please also include the validity of special purpose stamps such as Certified Mail, Special Delivery, Special Handling, Registry, and Newspaper stamps.

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 16, 2005
