

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
Submitted 5/16/2005 1:03 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-73-74]

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

R20051Oint

DBP/USPS-73 [a] With respect to the EXFC/PETE/Express Mail testing program, please identify the USPS employees or categories of USPS employees [provide the number of employees in that category] that have knowledge of or access to of the identity of droppers/reporters or the proposed location for dropping or receiving mail [prior to the delivery of the mailpiece]? [b] Please elaborate on the security employed to ensure that other USPS employees do not learn or have access to this information. [c] Please provide any studies by GAO/OIG/Inspection Service or any other group that evaluates the claimed disclosure of this information or the security to prevent disclosure that have been made in the past 6 years.

DBP/USPS-74

[a] Please provide a breakdown of the total number of EXFC reporters utilized for the most recent available time for each of the following address categories:

- [1] Residential City Delivery customer
- [2] Business City Delivery customer
- [3] Post Office Box customer
- [4] General Delivery customer
- [5] Rural Delivery customer
- [6] Highway Contract Delivery customer
- [7] Other [please specify]

[b] For the ZIP Codes that are included in each of the performance clusters that are part of the EXFC program, please provide the total number of delivery points in each of the seven categories shown in subpart a.

[c] Please provide a similar breakdown showing the number of mailpieces received by EXFC reporters during a reporting period in each of the seven categories shown in subpart a.

[d] Same as subpart b except provide the total number of mailpieces received by all addressees in each of the seven categories shown in subpart a.

[e] Please provide the level of confidence the data represents with the use of the number of reporters as shown in subpart a are utilized to measure the data for all of the potential addresses as shown in subpart b and the number of mailpieces shown in subpart c are utilized to measure the total mail volume shown in subpart d. Does the level of confidence change when the individual Performance Cluster data is evaluated? If so, please discuss and explain.

[f] Please provide similar information for the PETE program and the Express Mail program.

[g] Are the number of reporters utilized based on the number of potential addresses in an area or are the number of mailpieces tested based on the total number of mailpieces in the area or both? Please discuss the reasons.

[h] Please discuss the relative percentages of subpart a compared to subpart b and subpart c compared to subpart d as they are spread across the eighty-some Performance Clusters that are in the program. In other words, provide data that shows that all involved Performance Clusters are evaluated equally.

[i] Please discuss and explain any other criteria that are evaluated to ensure equal treatment between Performance Clusters, such as, whether the Performance Cluster does or does not make collections that comply with the Postal Operations Manual.

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
