

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
Submitted 5/17/2005 11:23 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-87-89]

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 17, 2005

Respectfully submitted,

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

R20051Rint

DBP/USPS-87 Please refer to your response to DBP/USPS-49 subpart h. [a] Please refer to the first sentence of your response and confirm that attempted delivery would be made on the fourth calendar day after mailing if both the second calendar day after entry and the third calendar day after mailing were a Sunday or holiday and Sunday/holiday street delivery is not available to the destination address, or in the case of an article sent to a post office box, the second and third calendar day after entry are days when the destination post office is closed [This would be where the letter was mailed on a Friday to a 2-day area and there was a Monday holiday]. [b] Please confirm that the first sentence of the response would also refer to mail sent to General Delivery as it relates to post office box delivery. [c] Please confirm that your response failed to provide the third calendar after mailing scenarios to the

following cases: [1] The article is mailed on a Saturday to an overnight area that does not have Sunday/holiday delivery and there is a Monday holiday. [2] The article is mailed after the Friday cut-off time to an overnight area that does not have Sunday/holiday delivery and there is a Monday holiday. [3] The article is mailed after the cut-off time on the day prior to a holiday [this could result in various scenarios depending upon the dates and relationship to Sunday. [d] Please confirm that if the original subpart h interrogatory would have had the words "or later" at the end of the first sentence, the response to DBP/USPS-49 subpart h and DBP/USPS-87 taken together would be a complete response to the corrected wording. [e] Please fully explain any subparts you are unable to confirm.

DBP/USPS-88 Please refer to your response to DBP/USPS-49 subpart h. Please provide a similar listing to the response provided in Docket R2001-1 Interrogatory DBP/USPS-65 subpart d. Please provide a listing and details of all post offices that do not send or receive shipments of Express Mail on all days of the week Monday through Saturday except for holidays. Are shipments made on some or all of the legal holidays? If so, please provide the details.

DBP/USPS-89 Please confirm, or explain if you are unable to confirm, that with the exceptions provided in response to DBP/USPS-88, an Express Mail article mailed prior to the cut-off time at all offices provided in response to DBP/USPS-21 on a Monday in a week that does not have a Tuesday or Wednesday holiday will receive the attempted delivery made on either Tuesday or Wednesday at all ZIP Codes and types of addresses provided in response to DBP/USPS-22.

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 17, 2005
