

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate Commission  
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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-108-126]

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."

June 3, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528  
R20051Vint108

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DBP/USPS-108                      Please refer to your response to DFC/USPS-45. Since the weight of an empty Priority Mail flat-rate envelope is approximately 1.36 ounces<sup>1</sup>, please explain how you could have 9.5% of the total volume weighing one ounce or less.

DBP/USPS-109                      Please refer to your response to DFC/USPS-57 subpart f. Please advise the percentage of overnight Express Mail that is mailed on a Saturday and delivered on a Sunday or is mailed on the day before a holiday and is delivered on the holiday that is transported by each of the following methods: [1] FedEx network [2] Commercial airplanes [3] Surface transportation.

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<sup>1</sup> Ten of them weighed 13.6 ounces.

DBP/USPS-110 Please refer to your response to DFC/USPS-59. Please clarify your response and confirm, or explain if you are unable to confirm, that the first sentence of your response to DFC/USPS-59 should read "Delivery of Express Mail addressed to a post office box is attempted when a notice is placed in the box and the lobby is open to allow the customer access to the box and the retail or other pickup services are available which would allow the customer to retrieve the Express Mail article once the notice was obtained from the box."

DBP/USPS-111 Please refer to your response to DFC/USPS-58. [a] Please advise the frequency that hard copy Express Mail directories are issued. [b] Are all of the continually changing parameters and schedules that you indicate exist made between versions of printed directories so that the printed directories will be obsolete in some to many to most offices? [c] If so, how are users of the printed directories knowledgeable in the level of available service? [d] How frequently and by what means are local post offices made aware of these continually changing parameters and schedules? [e] How frequently and by what means is the USPS website updated to show these continually changing parameters and schedules?

DBP/USPS-112 Please refer to Section 311[b] of the DMCS. [a] Please confirm, or explain if you are not able to do so, that this restriction applies only to copies that are mailed by the publisher of the referenced Periodicals publication that are not sample copies. [b] What is the rationale behind this restriction?

DBP-USPS-113 Please refer to your response to DBP/USPS-75 subparts i and k. [a] Please provide a definition and explanation of CON-CON. [b] Provide a definition of rotary locks and keys.

DBP-USPS-114 Please refer to your response to DBP/USPS-75 subparts a and c. [a] Please confirm, or explain if you are unable to do so, that there are costs associated with the construction and maintenance of registry cages, purchase and distribution of rotary locks and keys, purchase and distribution of pouches, and purchase and distribution of forms and labels associated with Registered Mail. [b] Why aren't these costs considered fixed costs? [c] How are these costs allocated?

DBP/USPS-115                    Please refer to your response to DBP/USPS-84. Please advise the specific steps that are taken by the EXFC Contractor to ensure that the mailpieces that a given dropper claims were mailed at a specific time and specific collection box were in fact actually mailed as stated.

DBP/USPS-116                    Please refer to your response to DBP/USPS-84. Please advise the specific steps that are taken by the EXFC Contractor to ensure that the mailpieces that a given reporter claims were received on a specific date were in fact actually received as stated.

DBP/USPS-117                    [a] Please reconcile the difference in the responses to DFC/USPS-59 and DBP/USPS-82 subpart b as they relate to the delivery of Express Mail to post office boxes when the customer does not have access to the box to receive the notification and/or the ability to claim the article. [b] If the Postal Service is allowed to claim on-time delivery of an Express Mail article by placing a notice of delivery in the customer's post office box at a time when either the customer does not have access to the box so as to be able to determine that the article is waiting for pickup and/or at a time when the customer is unable to retrieve the article, please explain the rationale for that determination.

DBP/USPS-118                    Please refer to your response to DBP/USPS-70. Please advise if there are any policy decisions or directives [and provide copies] with respect to the delivery of Express Mail as follows: An article arrives at a post office on Wednesday afternoon with a guaranteed time of delivery of noon on Thursday. Should the article be delivered on Wednesday afternoon or held for delivery on Thursday morning? Please explain the rationale behind your response.

DBP/USPS-119                    Please refer to your response to DBP/USPS-70. Please advise if there are any policy decisions or directives [and provide copies] with respect to the delivery of Express Mail as follows: An article arrives at a post office on Thursday morning with a guaranteed time of delivery of noon or 3 PM on Thursday. Should the city delivery, rural carrier, and/or HCR carrier deviate from the route to achieve the earliest possible delivery time on Thursday or should they deliver it at the normal time for that particular address [so long as delivery will be prior to the required delivery time]? Please explain the rationale behind your response.

DBP/USPS-120 Please refer to your response to DBP/USPS-70. Please advise if there are any policy decisions or directives [and provide copies] with respect to the delivery of Express Mail as follows: An article arrives at a post office on Thursday morning with a guaranteed time of delivery of noon or 3 PM on Thursday. Should the rural carrier and/or HCR carrier deviate from the route to achieve delivery prior to the guaranteed time if the normal time for delivery for the particular address would be after the required delivery time? Please explain the rationale behind your response.

DBP/USPS-121 Please refer to your response to DBP/USPS-71 subparts a and b. I am interested in receiving information on the post offices that Post Office-to-Post Office Express Mail may be sent to for claiming by 10 AM either the next day or the second day. Please reanswer.

DBP/USPS-122 Please refer to your response to DBP/USPS-71 subpart e. [a] Must provisions be made for a customer to be able to claim a Post Office-to-Post Office Express Mail article on a Saturday at a post office that does not have normal retail window hours on Saturday? [b] Must provisions be made for a customer to be able to claim a Post Office-to-Addressee Express Mail article addressed to a post office box on a Saturday at a post office that does not have normal retail window hours on Saturday? [c] Must provisions be made for a post office box customer to be able to claim accountable or articles too large for the box on a Saturday at a post office that does not have normal retail window hours on Saturday? [d] Must provisions be made for a street delivery customer to be able to claim accountable articles on a Saturday at a post office that does not have normal retail window hours on Saturday? [e] Please explain and provide the rationale for any negative responses.

DBP/USPS-123 Please refer to your response to DBP/USPS-71 subparts e through g. [a] Please confirm, or explain if you are unable to do so, that the Postal Service provides a listing of those offices that will deliver Express Mail on a Sunday or holiday to a street address and that this data is also incorporated in the POS terminal so the retail window clerk will be able to advise the customer the expected date of delivery. [b] Please provide a copy of the latest listing of these offices.

DBP/USPS-124 Please refer to your response to DBP/USPS-71 subparts e through g. [a] Please confirm, or explain if you are unable to do so, that the Postal Service provides a

listing of those offices that will deliver Express Mail to a post office box on a Sunday or holiday and that this data is also incorporated in the POS terminal so the retail window clerk will be able to advise the customer the expected date of delivery. [b] Please provide a copy of the latest listing of these offices.

DBP/USPS-125                      Please refer to your response to DBP/USPS-71 subparts e through g. [a] Please advise why a similar listing to those noted in DBP/USPS-123 and 124 is not available in hard copy for mailers to utilize. [b] Please advise why this information is not incorporated in the POS terminal.

DBP/USPS-126                      Please refer to your response to DBP/USPS-71 subpart h. [a] Please advise when the reliable data will be available and please provide it at that time. [b] Please provide the best estimate of the data at this time.

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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      June 3, 2005

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