

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-144-148]

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 7, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528
R20051Xint144

DBP/USPS-144 Please refer to your response to DFC/USPS-32. [a] Please confirm, or explain if you are unable to confirm, that your response means that for every failure of a return receipt to be properly completed in accordance with the various requirements of the USPS manuals, it would be as the result of the "carelessness" and/or "inattentiveness" of a single USPS employee to follow the requirements rather than as the result of a deliberate action. [b] Please confirm, or explain if you are unable to confirm, that your response means that there are no agreements, understandings, or procedures that exist at any post office in the country, including, but not specifically limited to IRS and state tax offices, government agencies in Washington DC as well as the field, and other large recipients of accountable mail, that allow for completion of the return receipt card in a manor which is not provided for in the

Postal Service's regulations, such as, but not specifically limited to, being completed by the addressee after the control of the mail has been transferred from the Postal Service to the addressee.

DBP/USPS-145 Please describe in detail the steps and processes that are involved in the delivery of the following types of mail from the time that it arrives at the delivery post office until the article has been delivered and all of the actions associated with the delivery are completed:

- [1] A mailpiece sent Certified Mail
- [2] A mailpiece sent Certified Mail with an Electronic Return Receipt
- [3] A mailpiece sent Certified Mail with a hardcopy Return Receipt [PS Form 3811]
- [4] A mailpiece with Delivery Confirmation

sent to each of the following addresses:

- [a] A single mailpiece sent to a typical residential address in Englewood NJ or a similar sized post office.
- [b] Mail sent to Internal Revenue Service, Andover MA 05501.
- [c] Mail sent to Internal Revenue Service, Philadelphia PA 19255
- [d] Mail sent to Internal Revenue Service, Memphis TN 37501.
- [e] Mail sent to Internal Revenue Service, Atlanta GA 39901
- [f] Mail sent to Internal Revenue Service, Kansas City MO 64999
- [g] Mail sent to Internal Revenue Service, Austin TX 73301
- [h] Mail sent to Internal Revenue Service, Fresno CA 93888
- [i] Mail sent to government agencies in Washington DC ZIP Codes 202-205.

If different steps and processes are utilized with the IRS depending on whether it is during the tax season as opposed to not during the tax season or for any other reason, please describe all steps and processes and the condition under which they are utilized.

If different steps and processes are utilized with the Washington DC post office depending on the size or type of agency or for any other reason, please describe all steps and processes and the condition under which they are utilized.

Please indicate in each of your detailed explanations the point at which the control of the mailpiece is transferred from the Postal Service to the addressee,

DBP/USPS-146 For each of the seven Internal Revenue Service locations provided in DBP/USPS-145 subparts b through h and for each of the four types of mailpieces in [1] through [4], please provide volume data for a given year and some indication of the volume that is handled during the tax season as opposed to the remainder of the year.

DBP/USPS-147 If a post office provides retail window service and/or collection from an Express Mail collection box on a Sunday, will the overnight service area be the one that is normally in use during the week, such as on a Tuesday for delivery on Wednesday, or will it be the one that is utilized for Saturday to Sunday delivery [except that delivery will be to every office rather than the restricted Sunday/holiday list]? If neither, please describe.

DBP/USPS-148 Please refer to page ii of the USPS OIG Report Number DS-AR-00-001. It was suggested that management establish milestones using the planned information technology platform to capture and develop a comprehensive system for measuring all streams of First-Class Mail. What specific suggestions were made and have they been implemented in the current EXFC program? If not, why not?

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 7, 2005
