

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
Submitted 6/9/2005 11:15 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-149-150]

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 9, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528
R20051Yint149

DBP/USPS-149 Please refer to your response to OCA/USPS-64. [a] Does the Postal Service believe that it should reduce the percentage of Express Mail articles that are not delivered by the scheduled delivery time? [b] If so, please explain the steps that are being taken to improve the service. [c] Please explain how the Postal Service can reduce the percentage of Express Mail articles that are not delivered by the scheduled delivery time if they do not determine and evaluate the causes of delivery failures?

DBP/USPS-150 Please refer to your statement in the Objection of the United States Postal Service to Interrogatory of David B. Popkin [DBP/USPS-90] dated June 8, 2005, that states, "They do not provide cost or revenue analyses, or show any recent changes to

Registered Mail practices." Please confirm, or explain if you are unable to confirm, that the reason this training material does not show any recent changes to practices is that there are no recent changes to show as noted in the response to DBP/USPS-54 and the use of the word "recent" goes back to at least five years.

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 9, 2005
