

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-151-153]

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
R20051Zint151

DBP/USPS-151 Please explain the procedure that is followed with respect to the various endorsements that are utilized with respect to address changes such as RETURN SERVICE REQUESTED, ADDRESS SERVICE REQUESTED, CHANGE SERVICE REQUESTED, etc. Please advise how they apply to the various classes of mail and the fees associated with each endorsement.

DBP/USPS-152 Please advise the quality control systems that are in place to ensure that mailers who utilize the various endorsements referenced in DBP/USPS-151 will receive the service that they expect and are provided for in the regulations.

DBP/USPS-153

[a] Please confirm that a mailer who makes an annual mailing to addressees and utilizes one of the various endorsements referenced in DBP/USPS-151, such as RETURN SERVICE REQUESTED will have mail returned to them as forwarding time expired if the Postal Service fails to provide the expected service in the previous year [for example, the addressee moves in February 2002 and files a Change of Address Order . A birthday card is sent to him in November 2002 endorsed RETURN SERVICE REQUESTED. The Postal Service forwards the card but fails to act on the RETURN SERVICE REQUESTED endorsement. The birthday card sent the following year in November 2003 is now returned as Forwarding Time Expired.] [b] In the scenario described in subpart a, is the mailer entitled to obtain the new address [assuming that it is still actually known] of the addressee since the failure of the Postal Service to provide the requested address in November 2002 is the cause for the address not being available? [c] If not, why not? [d] What is the minimum time that the Postal Service must keep new addresses on file?

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
