

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
Submitted 6/10/2005 10:35 am
Filing ID: 44753
Accepted 6/10/2005

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-154-157]

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 10, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528
R20051AAint154

DBP/USPS-154 Please refer to your response to DBP/USPS-5. Please confirm, or explain if you are unable to confirm, that there are two separate and different Table 4 for PQ 1 FY 2005 and that the first of them should read Table 5 for PQ 2 FY 2005.

DBP/USPS-155 Please refer to your response to DBP/USPS-5. Please confirm, or explain if you are unable to confirm, that there are many entries that are shown to the nearest integer or nearest tenth and that all of these entries are improperly truncated, namely, an entry such as 1.9 should really be shown as 1.90 and an entry such as 2 should really be shown as 2.00 and that all entries are expressed to the nearest one-hundredth of a percent.

DBP/USPS-156 Please refer to your response to DBP/USPS-5. [a] Please confirm, or explain if you are unable to confirm, that for the first table of delivery times, the overnight percentage for the nation is 95.09% plus 2.01% and minus 2.63%; for 2-day delivery is 89.77% plus 5.51% and minus 10.66%; and for 3-day delivery is 83.17% plus 7.15% and minus 9.68% when the data for out of the 48 continental states is omitted. [b] Please explain and discuss why in general the performance for overnight mail is better than 2-day and 3-day delivery and why 2-day delivery is better than 3-day delivery. [c] Please explain and discuss why the spread [maximum value minus the minimum value] of this data is much greater for 2-day and 3-day mail than it is for overnight mail.

DBP/USPS-157 Please refer to your response to DBP/USPS-5. Please explain and discuss the extent to which upper management stresses, including by means of pay administration, the need to improve one's overnight score vs. 2-day and/or 3-day scores.

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
