

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
Submitted 6/10/2005 4:17 pm
Filing ID: 44834
Accepted 6/10/2005

Postal Rate and Fee Changes]
Pursuant to Public Law 108-18]

DOCKET NO. R2005-1

INTERROGATORY OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-158]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatory 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
R20051BBint158

DBP/USPS-158 Please refer to your response to DFC/USPS-64. [a] Please advise why you refer to the Express Mail piece as a "Next Day piece" since it will not be delivered for two days. [b] Please confirm, or explain if you are unable to confirm, that for determining the guaranteed delivery date and time for an Express Mail piece, the first step is to evaluate the transportation that exists from the office of mailing to the office of delivery based on the relationship of the time of mailing to the cutoff time for that date. The second step is then to determine that if the transportation that is available will provide delivery on a Sunday or holiday then the list of those offices that deliver on a Sunday or holiday [or post office boxes that are accessible on a Sunday or holiday in the event of mail addressed to a post office box] to

determine if the guaranteed date of delivery will be the Sunday or holiday or will be deferred to the next delivery date after the Sunday and/or holiday.

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 10, 2005
