Postal Rate Commission
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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate and Fee Changes] DOCKET NO. R2005-1
Pursuant to Public Law 108-18]

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE [DBP/USPS-167-173]

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 16, 2005 Respectfully submitted,

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

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DBP/USPS-167 Please refer to your response to OCA/USPS-112 subpart c. [a] Please clarify your response. Should the second response to subpart c - i read upgraded from 3-day to 1-day : 16 as was asked in the original interrogatory? If so, please provide a listing of these 16 ZIP Code pairs, the date of the upgrade, and an explanation of how it was possible to upgrade them from 3 days to overnight. If not, please explain why you show two different values for upgraded from 2-day to 1-day, namely 16 in response to subsubpart i and 35 in subsubpart ii. [b] Please provide a listing of the 3 ZIP Code pairs that were downgraded from 1-day to 3-days, the date of the downgrade, and an explanation of why it was necessary to downgrade them from overnight to 3-day.

DBP/USPS-168 Please refer to your response to OCA/USPS-113. [a] Please advise who the contractor is that provides the EMVS service to the Postal Service. [b] Please provide the manual for EMVS similar to the one that was provided for the EXFC program. [c] Please provide the results of each of the quarterly tests that have been conducted. Please also provide the PTS data for the each of the elements in the EMVS data so that a comparison may be made as to the reliability of the PTS data. [d] In the response to DBP/USPS-73 and 74 et. al., the Postal Service appeared to state that there was no system for Express Mail that uses droppers and shippers similar to the EXFC and PETE systems. Based on the response to OCA/USPS-113, it would appear that an update or correction is required to a number of my interrogatory responses. Please advise and provide as appropriate.

DBP/USPS-169 Please refer to your response to DFC/USPS-69. DMM Section 163.3.1d states,"Be securely bound by permanent fastenings such as staples, spiral binding, glue, or stitching. Loose-leaf binders and similar fastenings are not considered permanent.
[a] Please explain where it states who must make the secure binding of the mailing. [b] Please explain why I cannot take a copy of this morning's *The New York Times* newspaper and put several staples through the various sections and create a mailing which meets all of the criteria for mailing as Bound Printed Matter. [c] If the publishers of *The New York Times* were to place a number of staples into the newspaper at their printing plant before delivering the newspaper to me, would it then be mailable as Bound Printed Matter? [d] If so, please explain why two identical pieces of mail are not treated identically.

DBP/USPS-170 Please refer to your response to DFC/USPS-70. [a] Is there some particular significance to the ZIP Code order of the data provided? [b] If so, what is it? [c] Please provide a complete listing of all of the characteristics that apply to each of the Fee Groups. [d] If there are Erent costs involved, please provide the cutoff values between each of the fee groups as appropriate. [e] Have the Erent cutoff values and/or the criteria for determining them changed since that system was established in the original rate case? [f] If so, please provide complete details. [g] What is the date used to determine the fee category listed in the attachment? [h] At what intervals does the Postal Service plan to update the fee categories utilized? [i] When is the next reevaluation scheduled for?

DBP/USPS-171 Please refer to your response to DBP/USPS-8 subpart g. [a] In your upcoming responses to DBP/USPS-129, 130, and 131, it would appear that the revised

response dated June 15, 2005 only stands to answer part of subpart a of DBP/USPS-129. Please also advise which of the 19 categories of mailpieces, if any, [A through S] use a CONFIRM code. [b] Please confirm, or explain if you are unable to confirm, that CONFIRM codes are mailer applied. [c] Please advise the use that is made of the CONFIRM code. [d] Please advise the data that is contained in a CONFIRM barcode. [e] Please advise whether your response to DBP/USPS-73 is still correct when one considers the availability of CONFIRM codes and their accessibility.

DBP/USPS-172 Please refer to your response to DBP/USPS-46 subpart c. Your response does not provide the information that was requested. What I am looking for is to go down the list of each of the nine items in DMM Section 101.1.2 as well as the criteria in DMM 101.6.4 and then explain whether there have been any tests, experiments, evaluations, studies, etc. with respect to that characteristic that now show that the mailpiece no longer has a tendency to be nonmachinable and that there is no longer a presumptive manual processing of that mailpiece. For example, have there been any tests, experiments, evaluations, studies, etc. that now show that the maximum height for a letter can be increased above 6-1/8 inches and still allow for machinable processing?

DBP/USPS-173 Please refer to your response to DBP/USPS-46 subpart a. DMM section 101.1.2f states that a letter-size piece is nonmachinable [and therefore requires payment of the surcharge if 1 ounce or less] if the thickness is less that 0.009 inch [if the piece is more than 4-1/4 inches high or 6 inches long]. [a] Please confirm that the standard size #6-3/4, #9, and #10 envelopes are of such a size that they must have a thickness of 0.009 inch to be mailable without the surcharge if they weigh one ounce or less. [b] Please confirm that the thickness of the #6-3/4, #9, and #10 stamped envelopes that are sold by the Postal Service have a thickness of the empty envelope itself of between 0.007 inch and 0.009 inch at all points except where there is an overlap of the flaps. [c] Please confirm that the thickness of most commercially available #6-3/4, #9, and #10 size envelopes have a thickness of the empty envelope itself of between 0.007 inch and 0.009 inch at all points except where there is an overlap of the flaps. [d] Please confirm that if I mail an empty #6-3/4, #9, and #10 size envelope that I would have to pay the nonmachinable surcharge since the thickness of the envelope is between 0.007 inch and 0.009 inch. [e] Please confirm that if a mailer takes a single sheet of 8-1/2 by 11 inch paper and fold it exactly in thirds and inserts it into a #10 size envelope that there will be a portion of the envelope where the thickness of the envelope will

be less than 0.009 inch. [f] Please confirm that if a mailer takes a small or large size bank check and inserts it into a #10 size envelope that there will be a portion of the envelope where the thickness of the envelope will be less than 0.009 inch. [g] Please confirm that a mailer of either of the envelopes referenced in subpart e or f will have to pay the nonmachinable surcharge since a portion of the envelope will be less than the required 0.009 inch thick. [h] Please confirm that close to 100% of all one ounce letter size envelopes that are over 4-1/4 inches high or 6 inches long would have some portion of the envelope that is less than 0.009 inch thick. [i] Please confirm that the envelopes referred to in subpart h would require payment of the nonmachinable surcharge. [j] Please advise what percentage of these envelopes referred to in subpart h you estimate will actually will pay the nonmachinable surcharge. [k] Please advise what steps the Postal Service takes to ensure that all of these mailers of envelopes as referred to in subpart h pay the appropriate nonmachinable surcharge. [l] If you do not believe that 100% of the area of the envelope must have a thickness of 0.009 inch to avoid payment of the nonmachinable surcharge, what percentage of the area of the envelope must have a thickness of 0.009 inch to avoid payment of the surcharge? [m] If your answer to subpart l is any value other than 100%, please explain why the DMM rule does not contain that value so that mailers will be aware of the requirements and pay the appropriate postage. [n] Please confirm that all mailers have an obligation to read the rules as they are written and comply with them 100% of the time and pay the postage at the rates that are provided for in the rules. [o] Please confirm that measuring the thickness of a single envelope requires a micrometer. [p] Please advise how many of the retail windows at post offices have a micrometer available to evaluate this criteria. [q] Please advise how mailers are expected to comply with this regulation. [r] Please explain any subpart that you are unable to confirm.

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 16, 2005