

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
Submitted 6/24/2005 2:39 pm
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Postal Rate and Fee Changes]
Pursuant to Public Law 108-18]

DOCKET NO. R2005-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-203-209]

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 24, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528
R20051HHint203

DBP/USPS-203 Please refer to your response to OCA/USPS-119. Please explain the steps and methods that are taken by the Postal Service to reduce missed collections, such as but not limited to, collection box tests, scanning boxes on collection, downloading scanning results, follow-up on missed or early collections.

DBP/USPS-204 Please refer to your response to DBP/USPS-139. If days to delivery is not a measure of service performance, what is it a measure of and what uses does the Postal Service make of evaluating the data?

DBP/USPS-205 Please refer to your response to DBP/USPS-140. Please provide the specific advantages and disadvantages of calculating days to delivery on an hourly basis as opposed to using calendar days. Please also explain how it relates to whether the mailpiece was delivered prior to or after the scheduled/guaranteed delivery time.

DBP/USPS-206 Please refer to your response to DBP/USPS-141. Based on your response to DBP/USPS-141, it would appear that the chart provided in response to DBP/USPS-69 subpart g requires correction. Please provide an updated chart or explain why correction is not required.

DBP/USPS-207 Please refer to your response to DBP/USPS-143. There is a page which at the top states: "Document Name: Direct testimony Potter" and has a page number 16 at the bottom of the page. There are four bullet paragraphs on the page extending over to page 17 with three more bullet paragraphs. The first bullet paragraph shows a guideline of 1.5% if the dock to dock time is within three hours should be considered for overnight and the second bullet paragraph discusses two-day delivery areas if there is 0.5% of the facility's total originating volume.

Please reevaluate your response.

DBP/USPS-208 Please refer to your response to DBP/USPS-149 and OCA/USPS-135. You indicate that Postal Service field personnel are in the best position to identify and correct deficiencies. Interrogatory OCA/USPS-64 asked for a ranking and discussion of these evaluations by field personnel. Please provide the requested information.

DBP/USPS-209 Please refer to your revised response to DBP/USPS-5 filed on June 22, 2005. Please confirm, or explain if you are unable to confirm, that the only correction made to the original response relates to the heading on the top of each page that corrects the quarter to PQ 2 FY 2005 and that there were no corrections made to the individual data entries.

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 24, 2005
