

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

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-226-233]

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 28, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528
R20051KKint226

DBP/USPS-226 Please refer to your response to DBP/USPS-126. [a] Please provide the requirements and associated regulations which relate to the level of window service and all forms of delivery service that must and/or should be provided on a Saturday. [b] Please indicate any insight as to why 24% of the post offices feel that it is inappropriate to provide retail window service on Saturdays. [c] Does the 76% of post offices that are open on Saturday represent only independent post offices or does it also include classified stations and branches and/or contract station and branches? [d] If it includes any stations and/or branches, please provide a figure based on independent post offices only. [e] Please provide a breakdown for each of the Areas in the country. [f] Please confirm, or explain if you are unable to confirm, that there is now a recent policy to extend the retail window hours both on

weekdays and on Saturdays. [g] What is the current policy with respect to either increasing or decreasing the availability of retail window service on Saturdays?

DBP/USPS-227 Please refer to your response to DBP/USPS-152. Your response does not appear to address the quality control systems that are in place to ensure that mailers who utilize the RETURN SERVICE REQUESTED endorsement and are expecting a "manual" processing of a type of mailing as described in DBP/USPS-153. Please provide a response which addresses that type of mail.

DBP/USPS-228 Please refer to your response to DBP/USPS-153 subpart d. If a customer files a Change of Address order in January 2004, when may the Postal Service delete this information from its database?

DBP/USPS-229 Please refer to your response to DBP/USPS-153 subparts b and c. [a] If the Postal Service is aware of the customer's new address [the one that should have been provided in November 2002 but was not provided due to the fault of the Postal Service to provide the requested service] even though the retention period has expired, may it be provided to the mailer upon request? [b] If not, why not?

DBP/USPS-230 Please refer to your response to DBP/USPS-156. The Postal Service has apparently misinterpreted the wording of my original interrogatory. I have evaluated the data in response to DBP/USPS-5 specifically for only those Performance Centers that are within the Continental United States [excluding Alaska] and noticed that the data for overnight service was 95.09% for the Nation and that for the Performance Center with the best overnight score was 97.10% or 2.01% higher than the score for the Nation and the Performance Center with the lowest overnight score was 92.46% or 2.63% lower than the score for the Nation. The plus and minus values relate to the range over which the various Performance Centers run rather than a measure of the accuracy or reliability of the data for the Nation's value. Please respond to my original interrogatory.

DBP/USPS-231 Please refer to your response to DBP/USPS-157. Your response failed to indicate the extent to which a manager's performance is evaluated with respect to the overnight performance vs. their performance on 2-day and 3-day scores. Are they given equal weight or is one counted more than another? Please discuss fully?

DBP/USPS-232

Please refer to your response to Question 5 of the Presiding Officer's Information Request Number 7. Please provide a percentage of mailpieces that fall into each of the following three categories for each of the two quarters of data provided: [a] Those where the postage rate would have been less than \$7.70 if mailed at the ":normal" non-flat-rate box rate based on the weight and zone of the piece. [b] Those where the postage rate would have been \$7.70 if mailed at the ":normal" non-flat-rate box rate based on the weight and zone of the piece. [c] Those where the postage rate would have been greater than \$7.70 if mailed at the ":normal" non-flat-rate box rate based on the weight and zone of the piece. [d] Please provide for each of the two quarters of data provided, the total amount of postage that would have been charged for all of the pieces mailed in that quarter if the \$7.70 flat-rate was not in effect and the mailer had to pay the ":normal" non-flat-rate box rate based on the weight and zone of the piece. [e] Please provide the total postage that was paid for each of the two quarters [\$7.70 times the number of parcels].

DBP/USPS-233

Please refer to your response to Question 5 of the Presiding Officer's Information Request Number 7. Evaluation of the two data tables appears to indicate a number of entries where one might believe that the data entry was not fully reliable, for example,

[1] The weight of the mailpiece is less than the weight of the flat-rate box itself [7.4 and 8.6 ounces].

[2] The weight of the mailpiece is only a few ounces greater than the weight of the box itself.

[3] The weight of the mailpiece is as much as 52 pounds [a density of some 3 to 4 times that of paper].

[4] There is data in only one of the zones even though the total distribution over the 8 zones is reasonably even for the total value of all weights combined [for example, in PQ 1 for 16 pounds, there were 244 parcels sent to the 5th zone and none to any of the other seven zones].

[5] There is data in only a few of the zones and no parcels were sent to any of the remaining zones.

[a] Please discuss the reliability of each of the five items noted above. [b] Please enumerate any other categories of data that you feel may be unreliable. [c] Please provide a revised

chart of the data if you feel that any of the data for the five or more categories of potential unreliable data noted above warrants revision.

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 28, 2005
