

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
Submitted 7/5/2005 8:36 am
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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-234-243]

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."

July 5, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528
R20051LLint234

DBP/USPS-234 Please refer to your response to DFC/USPS-85. Please comment on the reliability of the data provided in your response as it relates to the noted volume which is either less than the weight of the flat-rate envelope itself¹ or with what would appear to be excessively high to be capable of fitting within the flat-rate envelope²

DBP/USPS-235 Please refer to your response to DBP/USPS-161. [a] Do you believe that filing a Change of Address Order relates to a Postal service? [b] If not, please explain why not. [c] If so, please explain why the rate does not appear in the DMCS.

¹ Approximate weight of 1.3 ounces each.

² Weights as high as 69-70 pounds appear in the data.

DBP/USPS-236 Please refer to your response to DBP/USPS-171 subpart d. Please confirm, or explain if you are unable to confirm, that when Confirm PLANET barcodes are utilized on EXFC mailing pieces they will be on outgoing mail.

DBP/USPS-237 Please refer to your response to DBP/USPS-171 subpart d. [a] Do Confirm PLANET Barcodes that appear on EXFC mailpieces contain any data which indicates any part of the destination address or information that is related to the destination address or would allow for the determination of the destination address or any part of it or related to a given group of addresses³? [b] If so, please explain.

DBP/USPS-238 Please refer to your response to DBP/USPS-171 subpart d. [a] Please confirm, or explain if you are unable to confirm, that when Confirm PLANET barcodes are utilized on EXFC mailing pieces they are scanned during the processing of the mail and are maintained in a database. [b] Please confirm, or explain if you are unable to confirm, that when Confirm PLANET barcodes are utilized on EXFC mailing pieces that in addition to the scanning that occurs during the processing of the mail a scan is also made of the Postnet Barcode and that both are maintained in a database so that destination address data or information may be obtained from a scan of a Confirm PLANET Barcode.

DBP/USPS-239 Please refer to your response to DBP/USPS-171 subparts d and e. [a] With respect to the EXFC testing program, please identify the USPS employees or categories of USPS employees [provide the number of employees in that category] that have access to the Confirm PLANET Barcode database which potentially could lead to the identity of reporters. [b] Please elaborate on the security employed to ensure that other USPS employees do not learn or have access to this information.

DBP/USPS-240 Please refer to your response to DBP/USPS-169. Your response to the original interrogatory DFC/USPS-69 appeared to be answered as you define it, "in the abstract". Please advise why a similar response cannot be made to the type of mailpiece that was contemplated by DBP/USPS-169 as was done with the type of mailpiece that was contemplated in DFC/USPS-69. Please provide the response.

³ For example, a 9-digit Postnet Barcode would provide either a specific destination address or a group of addresses on a given "block-face". An 11-digit Postnet Barcode would provide a specific address.

DBP/USPS-241 Please refer to your response to DBP/USPS-170 subparts h and i as provided in the Opposition to DBP/USPS-170 filed on June 27, 2005. Please confirm, or explain if you are unable to confirm, that a change in the Erent value for a given facility could result in a change in the Fee Group and thereby potentially the fee charged for a post office box at that facility.

DBP/USPS-242 Please refer to your response to DBP/USPS-170 subparts h and i as provided in the Opposition to DBP/USPS-170 filed on June 27, 2005. Please discuss the types of events that could occur in the determination of the Erent values that could lead to a change in the Erent value and thereby potentially lead to a change in the determination of the Fee Group for post office boxes at a given facility.

DBP/USPS-243 Please refer to your response to DBP/USPS-170 subparts h and i as provided in the Opposition to DBP/USPS-170 filed on June 27, 2005. Please discuss why the Erent data was not updated to cover changes in facilities that occurred since the original data was developed in Docket R2001-1.

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 July 5, 2005
