

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-283-303]

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 25, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528
R20051UUint281

DBP/USPS-283 Please refer to your response to DFC/USPS-76 revised on July 18, 2005. [a] Please advise the reasons behind the decision to utilize these offices as ones that are representative of the United States. [b] Please advise the CAG level of each of the ten offices. [c] Please describe what the CAG category represents. [d] Please advise the EAS/PCES level of each of the ten offices. [e] Please describe what the EAS/PCES category represents. [f] Please provide the range of CAG and EAS/PCES categories that exist in the country.

DBP/USPS-284 Please refer to your response to DBP/USPS-164. Your response failed to answer the specific question that was asked in DBP/USPS-164. Regardless of the percentage involved, it relates to the accuracy of the data collection which relates to the value of service.

DBP/USPS-285 Please refer to your response to DBP/USPS-173 subpart b. [a] Please clarify what you meant by "depending on the manner in which one measured the envelope." [b] Is there more than one way to measure the thickness of an envelope? [c] What methods are there to measure the thickness of a single envelope? [d] Please confirm or non-confirm the original interrogatory.

DBP/USPS-286 Please refer to your response to DBP/USPS-173 subpart c. Please explain why the Postal Service did not evaluate the thickness of commercially available envelopes when establishing the existing regulation.

DBP/USPS-287 Please refer to your response to DBP/USPS-173 subpart d. Please explain why you are not able to respond to the applicability of the nonmachinable surcharge for a mailpiece as described in my original interrogatory. Why must an acceptance employee examine the mailpiece? The mailpiece has been completely described to allow for a response. What would an examination of the mailpiece reveal that is not already described? Any items that are obviously properly completed, such as the mailpiece is properly addressed or that the envelope is made out of paper and not plastic are to be assumed.

DBP/USPS-288 Please refer to your response to DBP/USPS-173 subpart e. [a] Please explain the difference between the Postal Service not denying the possibility of such a circumstance and confirming that it is correct. [b] Please respond to the original interrogatory.

DBP/USPS-289 Please refer to your response to DBP/USPS-173 subpart f. For purposes of this interrogatory assume a small size bank check is approximately 2.75 by 6 inches and a large size is approximately 3.5 by 8.5 inches. [a] Please explain the difference between the Postal Service not denying the possibility of such a circumstance and confirming that it is correct. [b] Please respond to the original interrogatory.

DBP/USPS-290 Please refer to your response to DBP/USPS-173 subpart g. Please explain why you are not able to respond to the applicability of the nonmachinable surcharge for a mailpiece as described in my original interrogatory. Why must an acceptance employee examine the mailpiece? The mailpiece has been completely described to allow for a response. What would an examination of the mailpiece reveal that is not already described? Any items that are obviously properly completed, such as the mailpiece is properly addressed or that the envelope is made out of paper and not plastic are to be assumed.

DBP/USPS-291 Please refer to your response to DBP/USPS-173 subpart h. [a] Please explain why the Postal Service is not able to provide data on the type of mail that it handles. [b] Please advise how a response to my original interrogatory relates to the intentional mailing of an empty envelope. [c] Please respond to the original interrogatory.

DBP/USPS-292 Please refer to your response to DBP/USPS-173 subpart i. [a] Please explain why the Postal Service is unable to confirm that a specifically described mailpiece is or is not subject to the nonmachinable surcharge. [b] Why must an acceptance employee examine the mailpiece? [c] The mailpiece has been completely described to allow for a response. [d] What would an examination of the mailpiece reveal that is not already described? Any items that are obviously properly completed, such as the mailpiece is properly addressed or that the envelope is made out of paper and not plastic are to be assumed.

DBP/USPS-293 Please refer to your response to DBP/USPS-173 subpart j. [a] Please explain why the Postal Service is not able to provide data on the type of mail that it handles. [b] Please explain why the Postal Service is unable to confirm that a specifically described mailpiece is or is not subject to the nonmachinable surcharge. [c] Why must an acceptance employee examine the mailpiece? [d] The mailpiece has been completely described to allow for a response. [e] What would an examination of the mailpiece reveal that is not already described? Any items that are obviously properly completed, such as the mailpiece is properly addressed or that the envelope is made out of paper and not plastic are to be assumed.

DBP/USPS-294 Please refer to your response to DBP/USPS-173 subpart l. The original interrogatory asked for the percentage of the area that must have a thickness of 0.009 inch to avoid payment of the surcharge. A response of "an unquantifiable substantial majority"

does not provide a proper response. Please provide a response expressed as a numerical percentage from 0% to 100%.

DBP/USPS-295 Please refer to your response to DBP/USPS-173 subpart m. [a] Please explain how the Postal Service can state that single-piece First-Class Mail not meeting the minimum thickness requirement is an extremely uncommon phenomenon if the percentage of the envelope surface area that must exceed the 0.009 inch limit has not been specified. [b] Please explain how the Postal Service can state that single-piece First-Class Mail not meeting the minimum thickness requirement is an extremely uncommon phenomenon if the Postal Service has not examined the thickness of most commercially available envelopes [see DBP/USPS-173 subpart c].

DBP/USPS-296 Please refer to your response to DBP/USPS-173 subpart n. [a] While you may not expect all 280 million or more of your customers to read the Domestic Mail Manual, do you expect them to comply with it? [b] If not why not? [c] Do you expect postal window clerks or other customer service personnel to read and/or be responsible for the content of the Domestic Mail Manual? [d] If not, why not?

DBP/USPS-297 Please refer to your response to DBP/USPS-173 subpart p [a] Please provide your best estimate of the percentage of retail windows at post offices have micrometers available. [b] If they do not have a micrometer available, how can they determine compliance with this regulation?

DBP/USPS-298 Please refer to your response to DBP/USPS-173 subpart q. If the regulations as written do not allow for any part of the surface area to be less than 0.009 inches thick and if your response to DBP/USPS-173 subpart l provides an interpretation that an unquantifiable substantial majority of the surface area must meet the 0.009 inches thick requirement, please advise how diligence, good faith and assistance of postal personnel will allow for complying with the regulation as written.

DBP/USPS-299 Please refer to your response to DBP/USPS-237, 238, and/or 239. [a] If the EXFC mailpieces containing PLANET and POSTNET barcodes are scanned during mail processing and the scan data for these pieces are excluded from the Confirm database, what database are they available in and who has access to that data base? [b] If they are in a

database, what security exists to ensure that the data is only available to those few USPS employees previously identified as having access to EXFC internal information. [c] If they are not in a database, what use is made of them and why are the codes included in the first place?

DBP/USPS-300 Please refer to your response to DBP/USPS-234. [a] Please confirm, or explain if you are unable to confirm, that 2 parcels that were tallied for Express Mail flat-rate envelopes that weighed 70 pounds. [b] Please provide the actual data that was tallied prior to the conversion to the data that was provided in the response to the interrogatory. [c] Please explain how the conversion was made. [d] You refer to USPS T-4 testimony. Please provide a reference to the specific page numbers and line numbers.

DBP/USPS-301 Please refer to your response to DBP/USPS-234. In your response you state that you do not feel that the mail pieces that were excessively high in weight were not considered unreliable. [a] Please explain why the highest weight shown for a Priority Mail flat-rate envelope is 18 pounds while for Express Mail flat-rate envelopes there is data in every one pound category up to 70 pounds except for seven weight categories. [b] Please advise the density of the material that would have had to have been in a flat-rate envelope so as to have created a weight of 70 pounds.¹ [c] Please advise what you believe would be a reliable estimation of what would be shipped in a 70-pound flat rate envelope.

DBP/USPS-302 Please refer to your 7/21/2005 revised response to DBP/USPS-82 subpart d. Please explain how the different dates for the guaranteed delivery standards for PO to PO vs. PO to Addressee would appear on the [a] POS terminal, [b] USPS website, and [c] in an Express Mail directory.

DBP/USPS-303 Please refer to your 7/21/2005 revised response to DBP/USPS-82 subpart e. The DMM states that the article would be available for claim by 10 AM of the second day that the destination office is open for retail business. Monday would be the first day that it is open for retail business. Please reconcile the difference between your response and the DMM wording.

¹ For your information, I mailed a Priority Mail flat-rate envelope containing two construction bricks and weighing 8 pounds. The volume of the two bricks was virtually the maximum volume that could be placed into the envelope. If the weight of a flat-rate envelope was 70 pounds and the volume was that of the two bricks, the density of the material would have had to have been 16.4 grams per cubic centimeter. Copper has a density of 8.93 g/cc; steel is 7.48-8.00 g/cc; and lead is 11.34 g/cc.

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 25, 2005
