

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-306-309]

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."

August 15, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528
R20051BBBint306

DBP/USPS-306 Please refer to your response to DBP/USPS-213. You have indicated that A-Label Express Mail availability is based primarily on the availability of transportation necessary to meet the 10:00 AM delivery commitment. You have further indicated that A-Label Express Mail may be sent from all post offices throughout the country [except for Military ZIP Codes] to the 7200 post offices. Please explain why A-Label Express Mail may not be sent to other offices where there is already existing transportation is available such as

those offices that are within the overnight First-Class Mail service areas [such as from Englewood NJ 07631 to Paramus NJ 07652].

DBP/USPS-307 Please refer to your response to DBP/USPS-211 subparts a and b. The interrogatory asked how one would determine which 5-digit ZIP Codes in Los Angeles 900 have the availability of picking up A-Label Express Mail short of entering all 99 individual ZIP Codes from 90001 to 90099 into the USPS website. Your response stated that I could either use the USPS website, call 1-800-ASK-USPS, or ask a retail clerk. [a] Specifically, how would I use the USPS website to determine which of the 99 potential ZIP Codes in the 900 ZIP Code area have A-Label pickup service available [other than entering in each of the potentially 99 individual ZIP Codes one at a time]? [b] You indicate that one could call 1-800-ASK-USPS. When I did this, they indicated that I could send A-Label Express Mail to 90049. However, 90049 is not on the list that you provided in response to DBP/USPS-210 nor is it on the USPS website as being available. Furthermore, when I asked about sending A-Label to Express Mail to Torrance CA 90505, they indicated that I should contact the Torrance post office to determine where A-Label could be sent. What question should I have asked the operator to determine the correct information? [c] How would a local retail window clerk be able to determine which 5-digit ZIP Codes in Los Angeles 900 have the availability of picking up A-Label Express Mail short of entering all 99 individual ZIP Codes from 90001 to 90099 into their POS terminal? [d] Does the Postal Service have any intention of replacing Publication 272 either in hard copy or on the website or both? [e] If not, why not?

DBP/USPS-308 Please refer to your response to DBP/USPS-297 subpart a. [a] Is a micrometer a standard piece of equipment that is provided to retail windows at post offices? [b] Is the method of utilizing a micrometer provided in the training of retail window clerks? [c] Please provide copies of any training material that explains the method of utilizing a micrometer.

DBP/USPS-309 Please refer to your response to DBP/USPS-297 subpart b. Please confirm, or explain if you are unable to confirm, that retail window clerks have the experience and judgment to be able to determine the

difference in thickness of an envelope on the order of one or two thousandths of an inch without the benefit of any tools or measuring equipment.

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 August 15, 2005
