

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate Commission  
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EVOLUTIONARY NETWORK DEVELOPMENT]  
SERVICE CHANGES, 2006]

DOCKET NO. N2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE  
[DBP/USPS-60-62]

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."

March 24, 2006  
N20061I

Respectfully submitted,

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

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DBP/USPS-60                      Please refer to your response to Interrogatory DBP/USPS-54 which refers to your response to Interrogatory DBP/USPS-32 which refers to your response to Interrogatory DBP/USPS-14. [a] Please provide the information that was requested in DBP/USPS-14 with the list of facilities that were provided in response to your Interrogatory DBP/USPS-54. [b] Your response to Interrogatory DBP/USPS-54 provides a listing of some 1900+ facilities. Please advise the order in which these 1900+ facilities have been shown in your response. [c] If there is no logical order for the 1900+ facilities, please provide the listing in order of ZIP Codes of the facility. Please also either number each facility or number the pages of the listing or both. [d] I notice that my local post office, Englewood NJ 07631 is

shown on the listing. Englewood has not had mail processing equipment in some time now. Please advise why Englewood NJ is shown on the listing. [e] Please advise the date of issuance of this listing. [f] If this listing is more than six months old, please provide a listing which is less than six months old. [g] Please provide an explanation of any of the abbreviations that appear in the listing other than those that have already been provided in response to Interrogatory DBP/USPS-48.

DBP/USPS-61 Please refer to your response to Interrogatory DBP/USPS-48. Please provide a more comprehensive discussion of the difference between a P&DC and a P&DF, Discuss the levels of transportation and destinations served for categorizing a facility as a P&DC vs. a P&DF.

DBP/USPS-62. Please refer to your response to Interrogatory DBP/USPS-52. [a] Please explain why mail from ZIP Code area 049 has a 2-day service standard for mail destinating to ZIP Code area 047 even though both of these areas are in the same SCF. [b] For each of the four separate ZIP Code areas [044 / 046 / 047 / 049] served by the Eastern Maine P&DF provide the range of times that the final dispatch of value arrives at that plant from the various Associate Offices in each of the separate ZIP Code areas. [c] Please confirm, or explain if you are unable to confirm, that the mail arriving at the Eastern Maine P&DF from the 049 Associate Offices is segregated from the mail arriving at the plant from the other three ZIP Code areas. [d] Please advise the time or times that the final dispatch of value from the Eastern Maine P&DF containing mail originating in the 044/046/047 ZIP Code areas and destinating in the 047 ZIP Code area so that it will be delivered on the next delivery date after mailing. [e] Please advise the time or times that the final dispatch of value from the Eastern Maine P&DF containing mail originating in the 049 ZIP Code area and destinating in the 047 ZIP Code area will be dispatched.

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#### 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 March 24, 2006

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