

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-63-67]

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 27, 2006
N20061J

Respectfully submitted,

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

DBP/USPS-63 Please refer to your response to Interrogatory OCA/USPS-9 subpart b. If the positive 55,874 in the overnight column shows the increase in overnight mail from 2-day delivery shouldn't the negative 55,874 represent a reduction in 2-day delivery for mail shifted to overnight and not the response provided of a shift from 3-day to 2-day?

DBP/USPS-64 Please refer to your response to Interrogatory OCA/USPS-10. Please explain how you can have an increase of 11,972 overnight mail pieces without a corresponding decrease in either 2- or 3-day pieces [in other words, what was the standard for those 11,972 pieces prior to the consolidation?].

DBP/USPS-65 Please refer to your response to Interrogatory DBP/USPS-51. Witness Shah is the one that used the criteria that apply for 2-day service standards in this Docket. [a] Please confirm, or explain if you are unable to do so, that the Docket No. N2006-1 is more recent than Dockets No. N89-1 and C2001-3. [b] Please advise the specific part or parts of the record in Docket No. N89-1 that provide the reason or reasons why the ZIP Code pairs that are 3-day service within the same state have that service standard. [c] Please advise why Witness Shah used the definition he did in his testimony when it did not apply as shown.

DBP/USPS-66 Please refer to your response to Interrogatory DBP/USPS-53. Interrogatory DBP/USPS-53 did not ask you to confirm that there are standards for remote ZIPs for Periodicals and Standard Mail and no similar standards for remote ZIPs for Package Services. It asked why this condition exists. Please provide the reason or reasons.

DBP/USPS-67 Please refer to your response to Interrogatory DBP/USPS-56. [a] Please advise the specific parts of Dockets No. N89-1 and C2001-3 that show all of the detailed criteria for determining which service standards apply to which ZIP Code pairs. [b] Please advise why the data provided in Docket No. N2006-1 contains information which is at variance with the allegedly still current data contained in Dockets No. N89-1 and C2001-3.

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 27, 2006
