

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate Commission  
Submitted 6/14/2006 7:58 pm  
Filing ID: 49566  
Accepted 6/14/2006

Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE  
[DBP/USPS-99-104]

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."

June 14, 2006

Respectfully submitted,

R20061N

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

---

---

DBP/USPS-99 [a] With Express Mail there are three separate times for guaranteed delivery, 10 AM, 12 Noon, and 3 PM. If a specific delivery office has one of these times for a guaranteed delivery on a specific day, confirm, or explain if you are unable to confirm, that the guaranteed time will apply regardless of the origin of the article. For example, Express Mail destined to Closter NJ 07624 will be guaranteed for delivery by 3 PM on a non-holiday weekday. Does that 3 PM guaranteed time apply for any Express Mail sent to Closter guaranteed for Next Day delivery regardless of whether it is sent from California, New York, or a neighboring town in New Jersey?

[b] If not, please explain.

DBP/USPS-100 [a] If the recipient of an Express Mail article incurs an expense due to the failure of the Postal Service to delivery the article by the guaranteed delivery time, may a claim be made under the merchandise and/or document reconstruction insurance to cover out-of-pocket expenses incurred up to the limits of indemnity [I assume that a refund of postage is also available since the article was not delivered on time]? Please ensure that the response provides a general response to the question as well as the following specific examples:

[1] Replacement of sporting or entertainment tickets.

[2] The need to reship or retransmit documents.

[3] The need to purchase a replacement article of merchandise for availability at a specific event.

[b] If not, why not?

DBP/USPS-101 [a] If a mailer submits a claim for indemnity [Express Mail, Registered Mail, Insurance, or COD] which is denied, will an explanation of the reasons for denial and the regulatory support be provided to the mailer?

[b] If not, why not?

[c] Please describe the rights of appeal that may be made by the mailer.

DBP/USPS-102 Please describe any differences that exist in the criteria of what is covered and the extent to which it is covered for loss or damage to a mailpiece that is covered by merchandise insurance vs. a COD mailpiece.

DBP/USPS-103 [a] For a recent one year period, please advise the number of Change of Address Orders that have been processed by each of the acceptable methods of filing such an order.

[b] Please indicate the total receipts for the \$1 fee that have been received for each of the methods listed in subpart a.

[c] Please indicate the arrangements that exist with the credit card company with respect to the \$1 charge being made to one of their cards, in other words, does the Postal Service receive the \$1 amount and then be required to pay an amount to the credit card company or does the Postal Service receive part of the \$1 charge less the credit card company fee? If the arrangements are different for different credit card issuers, please explain.

[d] How much of the total amount shown in the response to subpart b was retained or received by the Postal Service?

[e] Please advise any differences that exist with respect to the cost or amount received or retained by the Postal Service between the \$1 credit card charge for a Change of Address Order and a \$1 credit card charge made at a retail window such as the purchase of ten 10¢ postage stamps.

[f] Same as subpart e except with respect to a \$1 credit card charge at an APC machine.

DBP/USPS-104 [a] Please confirm, or explain if you are unable to confirm, that the purpose of the \$1 credit card charge is to ensure that the request is a legitimate request.

[b] Please advise how this \$1 credit card charge provides a level of security to ensure that the Change of Address Order is a legitimate request.

[c] Please advise how the Postal Service ensures that Change of Address requests that are made without the credit card charge are legitimate requests.

---

---

### 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 June 14, 2006

---

---