

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
Submitted 6/23/2006 2:43 pm
Filing ID: 49814
Accepted 6/23/2006

Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
WITNESS KIRK T KANEER [DBP/USPS-T41-1-8]

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 23, 2006

Respectfully submitted,

R20061P41

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

DBP/USPS-T41-1 Please provide a file similar to the file contained in Library Reference 125 Part C with two additional columns placed between columns D and E and showing the current Erent values and the percent change from current to proposed Erent values

DBP/USPS-T41-2 Please fully explain how Erent values are calculated and showing the specific criteria that are considered.

DBP/USPS-T41-3 Please refer to pages 15 and 16 of your testimony. [a]
Please confirm, or explain if you are not able to confirm, that the greatest change in fee

groups is limited to only one group, i.e. an existing Group 4 facility will either gain one group to Group 3, stay the same, or drop one group to Group 5.

[b] With respect to the fee group specifications that are shown on the bottom of page 15 and the top of page 16, please confirm, or explain if you are unable to confirm, that these specifications are proposed for implementation in the current Docket.

[c] Please provide a chart showing the fee group specifications that are being utilized currently.

[d] If there was a change between the proposed information noted in subpart b above and in the current information noted in subpart c above, please discuss the rationale for making the changes that were made.

DBP/USPS-T41-4 [a] Please confirm, or explain if you are unable to confirm, that the Erent for Englewood NJ 07631 is \$19.75; for Englewood Cliffs NJ 07632 is \$27.70, and for Tenafly NJ 07670 is \$23.50.

[b] Please confirm, or explain if you are unable to confirm, that Englewood will change from Fee Group 2 to Fee Group 1, Englewood Cliffs will stay at Fee Group 1, and Tenafly will change from Fee Group 3 to Fee Group 2.

[c] Please provide specific details with actual numbers showing how the Erents for these three offices was calculated.

DBP/USPS-T41-5 [a] Please confirm, or explain if you are unable to confirm, that my Size 2 Post Office Box in Englewood NJ 07631 will experience a change in actual dollars than more than approximately 99.9% of the box holders in the country.

[b] Please explain why Englewood was chosen for this large increase.

DBP/USPS-T41-6 Please provide data that shows the number of ZIP Codes that fall into each of the various scenarios of existing Fee Group to proposed Fee Group. This chart would show the number of ZIP Codes in each of the categories such as, Group 1>Group 1, Group 1>Group 2, Group 2>Group 1, Group 2>Group 2, Group 2>Group 3, etc. In addition to the number of ZIP Codes, please also show the number of boxes that are in each category.

DBP/USPS-T41-7 Since the proposed Fee Groups will be affected by the original Fee Group that a specific office had, please advise how each of these groups was determined and

show the progression of fee group specifications that have evolved in each of the Dockets since then.

DBP/USPS-T41-8 Are there plans in future Dockets to shift to a greater reliance on the econometrically calculated local real estate costs and away from the original or current fee group? Please fully explain your response.

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 23, 2006
