

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate Commission  
Submitted 6/28/2006 8:28 am  
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Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE  
[DBP/USPS-115-124]

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 28, 2006

Respectfully submitted,

R20061S115

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

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DBP/USPS-115                      Please advise the number of droppers that are being utilized in the First-Class Mail EXFC Program.

DBP/USPS-116                      Please advise the number of droppers that are being utilized in the Priority Mail PETE Program.

DBP/USPS-117                      Please advise the number of return address panel members that are being utilized in the First-Class Mail EXFC Program.

DBP/USPS-118                      Please advise the number of return address panel members that are being utilized in the Priority Mail PETE Program.

DBP/USPS-119                      [a]     Does the EXFC and/or PETE Programs provide written instructions to the members of the return address panel?

[b]     If not, please explain how they are trained.

[c]     If so, please provide copies.

DBP/USPS-120                      Please refer to the reporter and dropper EXFC and PETE instructions that are referenced in Interrogatories DBP/USPS-62, 65, 79, and 80 and to any instructions that exist in response to Interrogatory DBP/USPS-119.

[a]     Please confirm, or explain if you are unable to confirm, that these instructions are provided to each and every member of the group to which they apply [i.e. the EXFC Dropper instructions are provided to the EXFC Droppers, etc.]

[b]     Please advise the number of pages and the size of page for each of the instruction "manuals".

[c]     Please advise how each of the instruction "manuals" have been marked confidential in accordance with 18 U.S.C. § 1905.

[d]     Please provide the specific wording that is used to provide the droppers/reporters/return address panel members of their obligations under 18 U.S.C. § 1905.

DBP/USPS-121                      [a]     Please confirm, or explain if you are unable to confirm, that mailers of certain accountable mail are able to enter the mailpiece number on the Internet and/or telephone and track the mailpiece and/or request an e-mail notification of either the current status or future activity of the mailpiece.

[b]     Please advise the categories of accountable mail, such as Certified Mail or Express Mail, which may be tracked on the Internet.

[c]     Please advise the categories of accountable mail, such as Certified Mail or Express Mail, which may be tracked on the telephone.

[d]     Please advise the categories of accountable mail, such as Certified Mail or Express Mail, which may not be tracked on the Internet.

[e]     Please advise the categories of accountable mail, such as Certified Mail or Express Mail, which may not be tracked on the telephone.

[f] For each of the categories of accountable mail provided in response to subparts d and/or e above, please advise whether postal employees are able to track the mail on the USPS Intranet.

[g] For each affirmative response to subpart f above, please advise why the information is not made available to the public and any plans to do so.

DBP/USPS-122 This Interrogatory refers to a request made for an e-mail notification for accountable mail tracking as referenced in Interrogatory DBP/USPS-121.

[a] Please confirm, or explain if you are unable to confirm, that this e-mail notification adds to the value of service.

[b] Please confirm, or explain if you are unable to confirm, that this e-mail notification may not be requested until the mailpiece has been scanned into the system.

[c] Please advise the various types of scans that are made and the conditions under which they are made and, if appropriate, the categories of accountable mail that they apply to.

[d] Please advise why a mailer must wait for an initial scan before being able to make a request for an e-mail notification.

[e] Please confirm, or explain if you are unable to confirm, that this initial scan may not take place for one or more days after mailing and that a mailer may have to make several Internet inquiries before discovering that the initial scan has been made allowing for an e-mail request.

[f] Please confirm, or explain if you are unable to confirm, that these repetitive checks reduce the value of the service to the mailer.

[g] Please list and describe those categories of accountable mail and/or mailing conditions such as method of mailing and/or method of paying for the postage that must be scanned at the time of acceptance.

[h] Please list and describe those categories of accountable mail and/or mailing conditions such as method of mailing and/or method of paying for the postage that may be scanned at the time of acceptance.

[i] Please list and describe those categories of accountable mail and/or mailing conditions such as method of mailing and/or method of paying for the postage that must be scanned at the time of acceptance if a request is made by the mailer.

[j] Please explain and discuss the methods by which the scanned information is processed from the individual scanner to the master Internet database and the times involved both as to when and how long it takes.

DBP/USPS-123

This Interrogatory relates to the scanning that is performed when blue collection boxes and/or post office lobby drops are collected.

- [a] Are scans made at all blue collection boxes?
- [b] If not, please describe and explain the categories of blue collection boxes that are not scanned.
- [c] Are scans made at all post office lobby drops?
- [d] If not, please describe and explain the categories of post office lobby drops that are not scanned.
- [e] Are scans made of all collections or only those collections that are listed? Please explain.
- [f] Please list and discuss any other collection points that are scanned besides blue collection boxes and post office lobby drops.
- [g] Please explain and discuss the use that is made of all of the scans that are made.
- [h] Please explain and discuss any use of the scans that would allow a determination that a collection box was either not collected or was collected prior to the scheduled time.
- [i] Please explain and discuss the action that would be taken.
- [j] Is this evaluation of the scan data made at the local level or at the District level, or both?
- [k] Is this evaluation of the scan data capable of being made in a manner that would allow for corrective action to be taken such as making a collection from a missed box or an early collected box and getting the mail to the processing plant to meet the service standards that would have been achieved if the mail had been properly collected.
- [l] What is the maximum time caused by the system that it would take for a local supervisor to download and check the scanner that a carrier used for a particular collection route to evaluate for missed or early collections?
- [m] Please explain and discuss whether all of the above procedures apply equally to those post offices that are in the EXFC Program as well as those that are not in the program.

DBP/USPS-124

This Interrogatory relates to the mailing of a single-piece Insured Mail article.

- [a] Please advise the various methods that such an article may be entered into the system, such as, a retail window, an APC, Click 'N Ship, etc.
- [b] For each of the methods enumerated in response to subpart a, please indicate the maximum value of insurance that may be obtained.

[c] For each of the methods enumerated in response to subpart a, please provide a copy of a sample receipt that would be provided to the mailer. If different types are utilized for different ranges of insurance value, please provide copies of all and state the range of insurance values to which they would apply.

[d] For each of the methods enumerated in response to subpart a, please provide a copy of the label that would be affixed to the mailpiece. If different types are utilized for different ranges of insurance value, please provide copies of all and state the range of insurance values to which they would apply.

[e] Please describe the methods of processing and delivering an Insured Mail article from the time that it arrives at the delivery office until it is delivered to the addressee including, but not limited to, the scans that are made, the accountability of the mail to each of the delivering carriers, and the delivery to the addressee. Please provide copies of any forms that are utilized. If different methods are utilized for different insurance values, please discuss and explain.

[f] Is electronic or hard copy [green card] Return Receipt service available for all classes and categories of Insured Mail?

[g] If not, please discuss explain.

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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      June 28, 2006

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