

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
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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-125-139]

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 29, 2006

Respectfully submitted,

R20061T125

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

DBP/USPS-125 Please confirm, or explain if you are unable to confirm, that Post Office-to-Post Office Express Mail may be mailed or deposited at all of the locations where Post Office to Addressee Express Mail may be mailed or deposited.

DBP/USPS-126 Please confirm, or explain if you are unable to confirm, that Post Office-to-Post Office Express Mail is addressed to an individual or company to be called for at a specific postal facility and that the obligation for notifying the addressee of the mail falls on the sender.

DBP/USPS-127 [a] Please confirm, or explain if you are unable to confirm, that Post Office-to-Post Office Express Mail may only be sent for claiming at a specifically designated postal facility, either an independent post office or a station or branch of an independent post office.

[b] Please confirm, or explain if you are unable to confirm, that Post Office-to-Post Office Express Mail may never be sent to a facility that is not one of those referenced in subpart a above.

[c] Please confirm, or explain if you are unable to confirm, that a facility to which Post Office-to-Post Office Express Mail may be sent will be able to receive such mail from throughout the entire country.

DBP/USPS-128 Please confirm, or explain if you are unable to confirm, that Post Office-to-Post Office Express Mail may only be claimed by the addressee at a retail service window during normal retail window service hours.

DBP/USPS-129 Please confirm, or explain if you are unable to confirm, that Post Office-to-Post Office Express Mail will have a guaranteed delivery standard of 10 A.M. on either the day after mailing or on the second day after mailing assuming that the retail window is open on the scheduled day of delivery.

DBP/USPS-130 Please confirm, or explain if you are unable to confirm, that whether Post Office-to-Post Office Express Mail will have a guaranteed delivery standard of either the day after mailing or on the second day after mailing that will be the same as whether Post Office to Addressee Express Mail is guaranteed for delivery on the next day or the second day after mailing.

DBP/USPS-131 Please confirm, or explain if you are unable to confirm, that Post Office-to-Post Office Express Mail scheduled to arrive on a day when retail window service is not available will be guaranteed for delivery by 10 A.M. on the next available day when retail window service is available.

DBP/USPS-132 Please confirm, or explain if you are unable to confirm, that Post Office to Addressee Express Mail is available for shipment throughout the country and will be guaranteed for delivery by 12 Noon or 3 P.M. on the next day or second day after mailing at

the earliest of those four times that the available transportation and delivery conditions will permit to occur reliably.

DBP/USPS-133 [a] Please advise the total number of postal facilities, either independent post offices or stations or branches, that Post Office-to-Post Office Express Mail may be sent to.

[b] Please advise the total number of postal facilities, either independent post offices or stations or branches, in the country.

DBP/USPS-134 Please confirm, or explain if you are unable to confirm, that transportation already exists that would allow for the reliable delivery of Post Office-to-Post Office Express Mail to all postal facilities that are currently in the overnight delivery area for First-Class Mail.

DBP/USPS-135 [a] Please explain and discuss why the number of facilities that Post Office-to-Post Office Express Mail may be sent to is limited and not available countrywide.

[b] What discussions have taken place about expanding the availability of this service?

DBP/USPS-136 Please advise all of the possible ways that a mailer may learn of the specific postal facilities that Post Office-to-Post Office Express Mail may be sent to. Please also be sure to describe the procedure that a mailer would use to determine the closest and/or most convenient location a mailer would use if the desired location is not available.

DBP/USPS-137 [a] Does a printed directory exist that shows all of the postal facilities that Post Office-to-Post Office Express Mail may be sent to?

[b] If so, please file a copy as a library reference and furnish me with a copy.

[c] If not, please confirm that such a directory used to exist and why it no longer is maintained.

DBP/USPS-138 [a] Does an electronic database exist that shows all of the postal facilities that Post Office-to-Post Office Express Mail may be sent to?

[b] If so, please file a copy as a library reference and furnish me with a copy.

DBP/USPS-139

A press release indicates that the US Postal Service awarded a contract to United Parcel Service to transport First-Class Mail and Priority Mail to and from 98 U.S. cities. Please provide a listing of the 98 cities and also a listing of the 16 U.S. cities and the classes of mail that are currently transported by United Parcel Service.

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 29, 2006
