

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-217-236]

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."

July 7, 2006

Respectfully submitted,

R20061Z217

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

DBP/USPS-217 Please refer to the response to Interrogatory DBP/USPS-T38-2 with respect to the testimony of Witness T38 at page 6, fn2. Please provide an Institutional response explaining If the Postal Service proceeds with its plan to issue the regulation described in the testimony, please advise the changes that will be necessary to the DMM for this proposed curtailment of service.

DBP/USPS-218 Please refer to the response to Interrogatory DBP/USPS-T38-3 with respect to the testimony of Witness T38 at page 6, fn2.

[a] Please provide an Institutional response explaining If the Postal Service proceeds with its plan to issue the regulation described in the testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to either pay part of its postage by means of a postage meter stamp or stamps and the rest, if any, by any other means, including, but not limited to regular postage stamps.

[b] If not, please explain the rationale behind the response.

DBP/USPS-219 Please refer to the response to Interrogatory DBP/USPS-T38-3 with respect to the testimony of Witness T38 at page 6, fn2. Please provide an Institutional response explaining the following:

[a] May the postage on a single Bound Printed Matter mailpiece have the postage paid by means of a permit imprint?

[b] If so, please describe the permit that is required, the forms that must be completed to make the mailing, the method of mailing, and the fee for obtaining that permit.

[c] If not, why not?

[d] What is the minimum number of mailpieces that may be mailed at one time using a permit imprint? If it is different for different classes or types of mail, please fully explain.

DBP/USPS-220 Please refer to the response to Interrogatory DBP/USPS-T38-3 with respect to the testimony of Witness T38 at page 6, fn2. Please provide an Institutional response explaining the following:

[a] Please explain why Bound Printed Matter is essentially a commercial product.

[b] What other services, classes, or types of mail are considered to be essentially a commercial product?

[c] For those services provided in response to subpart b above, please identify those that may be mailed as a single piece.

[d] Please identify any services, classes, or types of mail that are not available to any mailer, from the largest company to a single individual, on the same terms and conditions so long as the mail meets the appropriate conditions.

[e] Does the Postal Service believe that any mailer, from the largest company to a single individual, should have the ability to utilize any available service that they feel will best meet their mailing needs?

[f] If not, why not?

DBP/USPS-221 Please refer to the response to Interrogatory DBP/USPS-T38-4 with respect to the testimony of Witness T38 at page 6, fn2.

[a] Please provide an Institutional response explaining If the Postal Service proceeds with its plan to issue the regulation described in the testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to either pay part, all, or an excess amount of postage by means of an Automated Postal Center [APC] stamp or stamps and the rest, if any, by any other means, including, but not limited to regular postage stamps.

[b] If not, please explain the rationale behind the response.

[c] Please confirm, or explain if you are unable to confirm, that postage "stamps" generated by an Automated Postal Center [APC] are generated by the action of the customer and not by the action of the Postal Service.

[d] Please describe the distinction, if any, that exists between postage "stamps" that are generated by a postage meter [such as those provided by Pitney Bowes] and those that are generated by an APC as far as the involvement of the Postal Service in issuing the "stamp" or processing the mail with that method of postage prepayment.

DBP/USPS-222 Please refer to the response to Interrogatory DBP/USPS-T38-5 with respect to the testimony of Witness T38 at page 6, fn2.

[a] Please provide an Institutional response explaining If the Postal Service proceeds with its plan to issue the regulation described in the testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to either pay part, all, or an excess amount of postage by means of a computer generated stamp or stamps such as those provided by stamps.com and the rest, if any, by any other means, including, but not limited to regular postage stamps.

[b] If not, please explain the rationale behind the response.

[c] Please advise any differences in the acceptance of computer generated stamps compared to postage meter stamps in their use for this purpose.

DBP/USPS-223 Please refer to the response to Interrogatory DBP/USPS-T38-5 with respect to the testimony of Witness T38 at page 6, fn2.

[a] Please provide an Institutional response explaining If the Postal Service proceeds with its plan to issue the regulation described in the testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to either pay part, all, or an excess amount of

postage by means of Click N Ship on the computer and the rest, if any, by any other means, including, but not limited to regular postage stamps.

[b] If not, please explain the rationale behind the response.

DBP/USPS-224 Please refer to the response to Interrogatory DBP/USPS-T38-6 with respect to the testimony of Witness T38 at page 6, fn2.

[a] Please provide an Institutional response explaining If the Postal Service proceeds with its plan to issue the regulation described in the testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to mail the article with a rural delivery letter carrier?

[b] If not, please explain the rationale behind your response.

DBP/USPS-225 Please refer to the response to Interrogatory DBP/USPS-T38-7 with respect to the testimony of Witness T38 at page 6, fn2.

[a] Please provide an Institutional response explaining If the Postal Service proceeds with its plan to issue the regulation described in the testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to mail the article with a city delivery letter carrier?

[b] If not, please explain the rationale behind your response.

DBP/USPS-226 Please refer to the response to Interrogatory DBP/USPS-T38-8 with respect to the testimony of Witness T38 at page 6, fn2.

[a] Please provide an Institutional response explaining If the Postal Service proceeds with its plan to issue the regulation described in the testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to mail the article with a highway contract delivery letter carrier?

[b] If not, please explain the rationale behind your response.

DBP/USPS-227 Please refer to the response to Interrogatory DFC/USPS-T38-6 with respect to the testimony of Witness T38 at page 6, fn2.

[a] Please provide an Institutional response explaining If the Postal Service proceeds with its plan to issue the regulation described in the testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to mail the article at a retail service window?

[b] If not, please explain the rationale behind your response.

[c] Please confirm, or explain if you are unable to confirm, that at retail service windows the window clerk will have a number of separations to make with mail that is received over the window, such as, letters vs. flats vs. Priority Mail vs. Package Services.

[d] Please confirm, or explain if you are unable to confirm, that when a customer hands a mailpiece over a retail service window, the window clerk must evaluate the mailpiece so as to determine the proper separation as noted in subpart c above to place that mailpiece in.

[e] Please confirm, or explain if you are unable to confirm, that when a customer hands a mailpiece over a retail service window, the window clerk will usually evaluate the mailpiece to determine its mailability, postage, addressing, etc.

DBP/USPS-228 Please refer to the response to Interrogatory DBP/USPS-T38-9 with respect to the testimony of Witness T38 at page 6, fn2.

[a] Please provide an Institutional response explaining If the Postal Service proceeds with its plan to issue the regulation described in the testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to mail the article with any of the ancillary services such as, but not limited to, Certificate of Mailing, Delivery Confirmation, Signature Confirmation, Insurance, COD?

[b] Under the present regulations, may a single piece of Bound Printed Matter be mailed with these ancillary services?

[c] If not, please explain.

[d] Please advise why these services will no longer be available and why that is believed to be appropriate.

[e] Please advise what sections of the DMCS will be modified to reflect this change.

DBP/USPS-229 Please refer to the response to Interrogatory DBP/USPS-T38-10 with respect to the testimony of Witness T38 at page 6, fn2.

[a] Please provide an Institutional response explaining why the Postal Service believes that it is necessary to simplify window service operations.

[b] Please describe how you believe this proposed regulation will achieve that objective.

[c] Please confirm, or explain if you are unable to confirm, that retail window clerks will only offer those services most likely to be used by retail customers.

[d] Please provide a definition of a retail customer.

[e] Please provide a listing of other categories of Postal Service customers besides a retail customer.

[f] Please provide a definition of each of the categories of Postal Service customers provided in response to subpart e above.

[g] Please provide the services that are utilized by each of the categories of customers provided in response to subpart e above.

[h] Please advise which of these services may be obtained from a window clerk.

[i] Please advise where the other services may be obtained.

DBP/USPS-230 Please refer to the response to Interrogatory DBP/USPS-T38-11 with respect to the testimony of Witness T38 at page 6, fn2.

[a] Please provide an Institutional response explaining why the Postal Service believes that it is necessary to reduce the complexity of retail transactions for customers.

[b] Please describe how you believe this proposed regulation will achieve that objective.

DBP/USPS-231 Please refer to the response to Interrogatory DBP/USPS-T38-13 with respect to the testimony of Witness T38 at page 6, fn2. Please provide an Institutional response describing the characteristics of a mailpiece that would be eligible for mailing as Media Mail but would not be eligible to mail as Bound Printed Matter. Please evaluate the twelve pages of the DMM Sections that were provided in the response and provide a narrative that responds to the question that was asked and provides specific conditions.

DBP/USPS-232 Please refer to the response to Interrogatory DBP/USPS-T38-14 with respect to the testimony of Witness T38 at page 6, fn2. Please provide an Institutional response describing the characteristics of a mailpiece that would be eligible for mailing as Bound Printed Matter but would not be eligible to mail as Media Mail. Please evaluate the twelve pages of the DMM Sections that were provided in the response and provide a narrative that responds to the question that was asked and provides specific conditions.

DBP/USPS-233 Please refer to the response to Interrogatory DBP/USPS-T38-15 with respect to the testimony of Witness T38 at page 6, fn2. Please provide an Institutional response that confirms, or explains if it is unable to confirm, that there are no characteristics of a mailpiece that would be eligible for mailing as Bound Printed Matter but would not be eligible to mail as either Express Mail, Priority Mail, First-Class Mail, or Parcel Post.

DBP/USPS-234 Please refer to the response to Interrogatory DBP/USPS-T38-16 with respect to the testimony of Witness T38 at page 6, fn2. Please provide an Institutional response that confirms, or explains if it is unable to confirm, that a retail customer can make an easily distinguishable choice to use Bound Printed Matter [if the contents of the mailpiece are authorized] over Media Mail or Parcel Post.

DBP/USPS-235 Please refer to the response to Interrogatory DBP/USPS-T38-18 with respect to the testimony of Witness T38 at page 6, fn2. Please provide an Institutional response that discusses whether or not this reduction in service will be a change in the nature of postal services which will generally affect service on a nationwide or substantially nationwide basis.

DBP/USPS-236

[a] Please provide a listing of all types of single-piece mailings which under the present regulations, the postage may not be paid by means of postage stamps.

[b] Under the proposed regulations will there be any types of single-piece mailings, other than Bound Printed Matter, where the postage may not be paid by means of postage stamps?

[c] Please provide a listing of all types of single-piece mailings which under previous regulations, the postage could not be paid by means of postage stamps.

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 July 7, 2006
