

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-257-265]

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 11, 2006

Respectfully submitted,

R20061DD257

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

DBP/USPS-257 Please reconcile the apparent difference between the response to Interrogatory GCA/USPS-T42-6 which states that the new postmark includes the "Time in hours, minutes (HH:MM) using military time or PM designation" and the response to Interrogatory DBP/USPS-106 subpart a which states that "The time is shown as AM or PM" and subpart b which states, in effect, that specific numerical times are not shown.

DBP/USPS-258 Please refer to the response to Interrogatory DBP/USPS-106 subparts c and d.

[a] Is the clock normally programmed to show JUL 11 2006 AM from 12:01 AM local time on July 11, 2006 to 12 Noon on July 11, 2006 and JUL 11 2006 PM from 12 Noon on July 11, 2006 to 12 Midnight on July 11, 2006.

[b] If not, please explain and discuss.

[c] Specifically, is the cutover from July 11, 2006 to July 12, 2006 designed to take place at Midnight local time or is it designed to take place after all of the July 11th mail has been processed?

[d] What arrangements are made to ensure that all mail that is accepted at the various postal facilities that are open late on Income Tax Night and accepting mail upuntil Midnight will have all of that mail postmarked with the proper date, normally April 15th.

[e] Are there any particular times that the maintenance personnel will override the correct date and time or is their function limited to resetting the time to the correct local time after a "problem" occurs?

DBP/USPS-259 Please refer to the response to Interrogatory DBP/USPS-107 subparts a and c.

[a] Please explain the apparent contradiction between these two subparts where subpart a states that maintenance and spare parts have been reduced and subpart c which states that it does not affect the cost of mail processing.

[b] What cost savings are expected to be realized on an annual basis?

DBP/USPS-260 Please refer to the response to Interrogatory DBP/USPS-109. Please discuss and provide a comparison between the legibility and readability of the inkjet cancellation vs. the old style circular cancellation.

DBP/USPS-261 [a] Please provide annual data for the past three years showing the quantity of single-piece Bound Printed Matter articles that was mailed.

[b] Please advise the percentage of these mailpieces that were paid by means of adhesive postage stamps. If actual data is not available, please provide the best available estimate and the criteria that were utilized to make that estimate.

DBP/USPS-262 Please provide copies of any correspondence or requests that have been made by mailers groups or others to change the mailing conditions for Bound Printed Matter.

DBP/USPS-263 Please discuss the effectiveness of the Change of Address program when the Postal Service is faced with major requirements for forwarding mail as was caused by Hurricanes Katrina and Rita. Please discuss the efforts that were made to return to normal postal operation and an estimation of when that will be achieved.

DBP/USPS-264 Please furnish a copy of the Office of the Inspector General's Report DR-AR-05-017 that relates to Balloon Rate and Parcel Surcharges and Report IS-MA 06-001 that relates to Security Over Sensitive Customer Data on Automated Postal Center Kiosks. If it is filed as a Library Reference, please furnish me with a hard copy.

DBP/USPS-265 The following interrogatory is designed to evaluate the likelihood or potential that a customer who is utilizing an Automated Postal Center [APC] will leave the APC during a transaction while their credit or debit card is still activated and thereby allow a second customer to pick up the activity and obtain value from the APC which will be charged to the first customer.

[a] Please provide a copy of the screens that will appear after a customer has completed an APC transaction and until the APC will show the standard welcoming screen. Completed an APC transaction is defined as receiving the stamp either purchased as a separate stamp or as the stamp to affix to a mailpiece. If necessary, please provide separate screens for different types of transactions and/or for a credit card vs. a debit card.

[b] In these screens, please identify the point at which the credit/debit card data is no longer active and the first customer would have to re-enter the card to make an additional purchase or a second customer could obtain value under the first customer's card. If necessary, please provide separate data for a credit card vs. a debit card.

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 11, 2006
