

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-365-369]

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 19, 2006

Respectfully submitted,

R20061JJ365

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

DBP/USPS-365 What is the significance of the word "Topic" that is part of the words "Market Research Briefing - Topic" appearing on the lower left corner of the initial pages 1 through 11 of USPS LR-L-152?

DBP/USPS-366 [a] Assume that the rates and changes proposed in this Docket have been implemented, may the mailer of a one ounce First-Class Mail flat utilize a Forever Stamp and a regular 20¢ stamp to fully pay the postage?

[b] If not, why not?

DBP/USPS-367 Assume that the rates and changes proposed in this Docket have been implemented and further assume that a mailer deposits two, one ounce First-Class Mail articles that require postage at the flat rate of postage [62¢] either because the piece exceeds the dimensions for a letter or the mailpiece has one of the non-machinable characteristics. One of the articles has the postage paid with a Forever Stamp and the second article has the postage paid with a regular, denominated 42¢ stamp.

[a] Will both articles be treated in the same manner with respect to either being returned for additional postage and/or collection of postage due upon delivery?

[b] Please advise what action will be taken on these two mailpieces.

[c] Please provide the rationale for your responses to subparts a and b.

DBP/USPS-368 [a] Assume that the rates and changes proposed in this Docket have been implemented, may the mailer of a one ounce First-Class Mail parcel utilize a Forever Stamp and regular stamps totaling 58¢ to fully pay the postage?

[b] May the mailer utilize two Forever Stamps and 16¢ in regular postage to fully pay the postage?

[c] If not, why not?

DBP/USPS-369 If the response to subpart a of any or all of Interrogatories DBP/USPS-366 through DBP/USPS-368 and/or subpart b of Interrogatory DBP/USPS-368 is no, please confirm, or explain if you are unable to confirm, that this will introduce a added level of confusion with respect to the utilization of the Forever Stamp.

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 19, 2006
