

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-419-438]

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."

August 2, 2006

Respectfully submitted,

R20061MM419

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

DBP/USPS-419 Please refer to your response to Interrogatory DBP/USPS-217. Since you have indicated that revising the DMM is an ongoing process, please advise the present status and provide copies of any existing documentation.

DBP/USPS-420 Please refer to your response to Interrogatory DBP/USPS-218. Please confirm, or explain if you are unable to confirm, that under the present regulations, any single-piece mailing may have the postage partially paid by any combination of a postage meter stamp and any other means, including, but not limited to regular postage stamps.

DBP/USPS-421

Please refer to your response to Interrogatory DBP/USPS-220

subpart c.

[a] Please discuss any minimum quantity requirements that exist for a mailer to qualify to be able to mail Periodicals.

[b] Please discuss how frequently and under what conditions a mailer will actually mail a single mailpiece in a mailing of Periodicals.

[c] Please advise the postage rate that would apply for the mailing of a single Periodical. Please assume whatever criteria are necessary to respond to this question.

[d] Please provide details of any mailing of a single Periodical where the cost of mailing the Periodical mailpiece would cost more to mail as a Periodical than it would at the single-piece First-Class Mail/Priority Mail rate.

DBP/USPS-422

Please refer to your response to Interrogatory DBP/USPS-221.

Assume a mailer has a single-piece retail parcel that qualifies for mailing as Bound Printed Matter and is being sent to the 8th Zone and has a weight of 5-pounds and is mailed under the present regulations.

[a] Please confirm, or explain if you are unable to confirm, that the postage for this mailpiece under the present rates is \$4.23.

[b] Please confirm, or explain if you are unable to confirm, that mailer A could prepare this mailing and pay the postage by means of a postage meter [such as those that are provided by Pitney Bowes].

[c] Please confirm, or explain if you are unable to confirm, that mailer B could prepare this mailing and pay the postage by means of a \$4.23 stamp obtained from an Automated Postal Center [APC].

[d] Please confirm, or explain if you are unable to confirm, that mailer C could prepare this mailing and pay the postage by means of a \$4.23 worth of customer-generated computer postage [it may be necessary to overpay the postage since these stamps are only available in specific values].

[e] Please confirm, or explain if you are unable to confirm, that mailer D could prepare this mailing and pay the postage by means of a \$4.23 worth of regular adhesive postage stamps.

[f] Please confirm, or explain if you are unable to confirm, that mailer E could prepare this mailing and pay the postage by means of a \$4.23 worth of regular adhesive postage stamps which he/she then "canceled" with a Mailer's Postmark Permit.

[g] Assume that mailers A, B, C, D, and E each present their mailpiece to a retail window clerk. Please confirm, or explain if you are unable to confirm, that the action taken by the retail window clerk as well as any other postal employee processing the mailpieces will be identical in all five scenarios [mailers A, B, C, D, and E] except that the retail window clerk or other postal employee will have to cancel the stamps on the parcel submitted by mailer D.

[h] Please discuss whether, in general, postage stamps on mailpieces handed over a retail service window should be cancelled by the window clerk or should they be cancelled at the processing center.

[i] Assume that mailers A, B, C, D, and E each deposit their mailpiece in the APC or other lobby drop. Please confirm, or explain if you are unable to confirm, that the action taken by any postal employee processing the mailpieces will be identical in all five scenarios [mailers A, B, C, D, and E] except that a postal employee will have to cancel the stamps on the parcel submitted by mailer D.

[j] Assume that mailers A, B, C, D, and E each deposit their mailpiece in a blue collection box. Please confirm, or explain if you are unable to confirm, that the action taken by any postal employee processing the mailpieces will be identical in all five scenarios [mailers A, B, C, D, and E] except that a postal employee will have to cancel the stamps on the parcel submitted by mailer D.

DBP/USPS-423 Please refer to your response to Interrogatory DBP/USPS-224.

[a] Assume that mailers A, B, C, D, and E [referenced in Interrogatory DBP/USPS-422] each deposit their mailpiece [referenced in Interrogatory DBP/USPS-422] with their rural delivery letter carrier. Please confirm, or explain if you are unable to confirm, that the action taken by any postal employee processing the mailpieces will be identical in all five scenarios [mailers A, B, C, D, and E] except that a postal employee will have to cancel the stamps on the parcel submitted by mailer D.

[b] Will the mailer be able to give the mailpiece to the rural delivery carrier unstamped and give the carrier money to pay for the postage under the present regulations? Please explain.

[c] Will the mailer be able to give the mailpiece to the rural delivery carrier unstamped and give the carrier money to pay for the postage under the proposed regulations? Please explain.

DBP/USPS-424 Please refer to your response to Interrogatory DBP/USPS-225.

Assume that mailers A, B, C, D, and E [referenced in Interrogatory DBP/USPS-422] each deposit their mailpiece [referenced in Interrogatory DBP/USPS-422] with their city delivery

letter carrier. Please confirm, or explain if you are unable to confirm, that the action taken by any postal employee processing the mailpieces will be identical in all five scenarios [mailers A, B, C, D, and E] except that a postal employee will have to cancel the stamps on the parcel submitted by mailer D.

DBP/USPS-425 Please refer to your response to Interrogatory DBP/USPS-226. Assume that mailers A, B, C, D, and E [referenced in Interrogatory DBP/USPS-422] each deposit their mailpiece [referenced in Interrogatory DBP/USPS-422] with their highway contract delivery letter carrier. Please confirm, or explain if you are unable to confirm, that the action taken by any postal employee processing the mailpieces will be identical in all five scenarios [mailers A, B, C, D, and E] except that a postal employee will have to cancel the stamps on the parcel submitted by mailer D.

DBP/USPS-426 Please refer to your response to Interrogatory DBP/USPS-227 subparts c, d, and e. I am somewhat confused with your responses. If the window clerk makes an evaluation of the mailpiece that the mailer hands to them over the window as contemplated by subpart e, then wouldn't that evaluation have to be performed while the customer was still at the window in case the evaluation disclosed a question with the mailpiece? Please explain.

DBP/USPS-427 Please refer to your response to Interrogatory DBP/USPS-227. Please confirm, or explain if you are unable to confirm, that the thrust of the Postal Service's proposed rule change is with the requirement for the window clerk to be able to offer Bound Printed Matter to a mailer rather than the ability to just accept a Bound Printed Mail article that has already been prepared that way.

DBP/USPS-428 Please refer to your response to Interrogatory DBP/USPS-227. Please advise the training that is provided to retail window clerks to evaluate the service desired by a customer who presents a mailpiece and determines what options that are available and the prices and service standards that are associated with that service. Please provide copies of any training manuals.

DBP/USPS-429 Please refer to your response to Interrogatory DBP/USPS-227.

[a] Please provide a listing of all of the retail services that a mailer of a 10-ounce mailpiece may utilize.

[b] Please discuss the exchange that would take place between the mailer and the window clerk to determine the most appropriate service for that mailpiece.

[c] Please provide copies of the POS terminal screens that would appear both for the window clerk and for the customer at each point in this exchange until it is completed and the piece is mailed.

[d] Please provide similar exchanges and computer screens for other methods of retail window acceptance besides the POS terminal.

DBP/USPS-430 Please refer to your response to Interrogatory DBP/USPS-234.

[a] Please confirm, or explain if you are unable to confirm, that DMM Section 163 has six pages which refer to the Rates and Eligibility of Bound Printed Matter and another six pages of DMM Section 173 which refer to the Rates and Eligibility of Media Mail.

[b] Please confirm, or explain if you are unable to confirm, that the similar sections for Express Mail [DMM 113] is 7 pages, Priority Mail [DMM 123] is 4 pages, First-Class Mail [DMM 133] is 5 pages, and Parcel Post [DMM 153] is ten pages.

[c] Please confirm, or explain if you are unable to confirm, that if a window clerk, after determining the contents of a mailpiece determines that it eligible for both Bound Printed Matter and Media Mail is able to present three prices to the mailer and advise them that they all have the same service standards and the mailer will be able to choose the cheapest option of the three [BPM/Media/Parcel Post]. This assumes that the mailer does not need the expedited service of First-Class Mail/Priority Mail/Express Mail.

DBP/USPS-431 Please refer to your response to Interrogatory DBP/USPS-236.

Please confirm, or explain if you are unable to confirm, that in order to mail a single-piece Periodical that the mailer must have previously entered the publication as a Periodical and pay the appropriate fee.

DBP/USPS-432 Please refer to your response to Interrogatory DBP/USPS-236.

[a] Please provide a listing of all types of single-piece mailings [that may be made by any individual and not requiring any specific permit or authorization] 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 [that may be made by any individual and not requiring any specific permit or authorization], 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 [that may be made by any individual and not requiring any specific permit or authorization] which under previous regulations, the postage could not be paid by means of postage stamps.

DBP/USPS-433 Please refer to your response to Interrogatory DBP/USPS-237.

[a] Please confirm, or explain if you are unable to confirm, that many mailers have already purchased postage stamps and have them available to use for future mailings of any type of mailing for which stamps are authorized.

[b] Please advise all of the classes of mail besides single-piece Bound Printed Matter that postage stamps may be utilized for paying the postage.

[c] Please advise all of the places that a customer may obtain postage stamps.

[d] Please explain why a mailer who has already purchased the stamps in a previous transaction may not mail a single-piece Bound Printed Matter article in any place that a mailer who happens to have a postage meter to utilize for the postage.

[e] Please confirm, or explain if you are unable to confirm, that many mailers have already purchased precancelled postage stamps and have them available to use for future mailings of any type of mailing for which precancelled stamps are authorized.

[f] Please advise all of the classes of mail besides single-piece Bound Printed Matter that precancelled postage stamps may be utilized for paying the postage.

[g] Please confirm, or explain if you are unable to confirm, that many mailers have already purchased customer-generated computer postage stamps and have them available to use for future mailings of any type of mailing for which stamps are authorized.

[h] Under the proposed regulations, may the mailer of a single-piece Bound Printed Matter article utilize stamps that have been cancelled by a Mailer's Postmark Permit?

[i] If not, why not?

DBP/USPS-434 Please refer to your response to Interrogatory DBP/USPS-237.

Please confirm, or explain if you are unable to confirm, that the thrust of the Postal Service's proposed rule change is to eliminate methods of postage payments that require a retail window sale of postage stamps rather than the acceptance of the mail by a retail window clerk or any

other means by which a mailer could deposit the mail if it had the postage paid by a means that did not at some point in time require a retail window sale such as a postage meter.

DBP/USPS-435 Please refer to your response to Interrogatory DBP/USPS-103 subpart b.

Please explain how it was possible to have 225,355 Change of Address requests by the call center at \$1 fee for each request and only have received \$78,874.25 since that was only approximately 35¢ per request.

DBP/USPS-436 Please refer to your response to Interrogatory DBP/USPS-103 subpart c.

[a] Please advise the amount of the receipts that was paid in 2005 to the for credit card processing?

[b] Please advise the amount of the receipts that was paid in 2005 to the bank[s] that act as the agent for the credit card companies?

[c] Please advise the amount of the receipts that was paid in 2005 that was allocated to the Internet Change of Address service.

[d] If your response to subpart c above is not equal to the total receipts provided in your response to subpart b of the original Interrogatory DBP/USPS-103 less the amounts shown in subparts a and b above, please quantify and explain the difference.

DBP/USPS-437 Please refer to your response to Interrogatory DBP/USPS-103 subpart c.

[a] Please define what is meant by the term "providing the Telephone Change of Address Service".

[b] Please advise the organization that provides the Telephone Change of Address Service.

[c] Please advise the relationship of this organization to the United States Postal Service.

[d] Please advise the amount that was paid to the organization noted in response to subpart b.

[e] Does this organization provide any other services to the United States Postal Service?

[f] If so, please identify the services and the amount paid by the Postal Service for each of the identified services.

subparts e and f.

[a] Is the amount paid for the credit card processing the same regardless of whether there is a \$1 charge for a retail window sale, an APC sale, an Internet Change of Address request, or a telephone Change of Address request?

[b] Is the amount paid for the bank[s] that act as the agent for the credit card company the same regardless of whether there is a \$1 charge for a retail window sale, an APC sale, an Internet Change of Address request, or a telephone Change of Address request?

[c] Is the amount retained by the Postal Service the same regardless of whether there is a \$1 charge for a retail window sale, an APC sale, an Internet Change of Address request, or a telephone Change of Address request?

[d] Please explain and quantify any negative responses,

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 August 2, 2006
