

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-462-479]

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 7, 2006

Respectfully submitted,

R20061RR462

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

DBP/USPS-462 Please refer to your response to Interrogatory DBP/USPS-121 subparts b and c. Please advise whether a mailer of Delivery Confirmation, Signature Confirmation, and/or Collect of Delivery Mail may track the mailpiece on the Internet or by telephone. If necessary, please correct the responses to the other subparts of the original Interrogatory.

DBP/USPS-463 Please refer to your response to Interrogatory DBP/USPS-121 subpart g. You indicate that to provide tracking of insured items without Delivery Confirmations, it would be necessary to raise the price for all Insurance mailpieces.

[a] Please advise the estimated increase in price that would be necessary.

[b] Please show the calculations and data that were utilized to obtain your response to subpart a above.

[c] Please advise the amount that was added to the fees for other services that have the capability of Internet and/or telephone tracking.

DBP/USPS-464 Please refer to your response to Interrogatory DBP/USPS-121 subpart g. You indicate that the vast majority of mailers of Insured mailpieces are not interested in receiving the tracking information because they have chosen not to purchase Delivery Confirmation in addition to the Insurance.

[a] Please indicate the present cost of adding Delivery Confirmation to an Insured mailpiece.

[b] Please confirm, or explain if you are unable to confirm, that many mailers of Insured mailpieces may choose not to purchase Delivery Confirmation either because of its cost or lack of knowledge of its availability or need.

DBP/USPS-465 Please refer to your response to Interrogatory DBP/USPS-122 subpart c.

[a] May Delivery Confirmation mailpieces [and Collect of Delivery mailpieces if the response to Interrogatory DBP/USPS-462 indicates that they may be tracked] be scanned at the time of acceptance if the customer requests it?

[b] Are all of these accountable mailpieces automatically scanned at the time of acceptance if the postage has not already been applied by the mailer?

[c] If not, please explain.

DBP/USPS-466 Please refer to your response to Interrogatory DBP/USPS-122 subpart c.

[a] Should Delivery Confirmation mailpieces [and Collect of Delivery mailpieces if the response to Interrogatory DBP/USPS-462 indicates that they may be tracked] also be indicated in the last 4-1/2 lines of the response to subpart c?

[b] If not, please explain.

DBP/USPS-467 Please refer to your response to Interrogatory DBP/USPS-124.

[a] Under the present procedures please confirm, or explain if you are unable to confirm, that mailpieces that are insured for \$50 or less will be marked with an oval marking with the word INSURED contained in it.

[b] How does the mailer obtain this marking for mailpieces that are not mailed over a retail window?

DBP/USPS-468 Please refer to your response to Interrogatory DBP/USPS-124.

[a] Please confirm, or explain if you are unable to confirm, that PS Form 3813 as shown on attachment 1 will be utilized at a retail window.

[b] Please identify the source of the top two receipts shown on Attachment 2.

[c] Please identify the source of the bottom two receipts shown on Attachment 2.

DBP/USPS-469 Please refer to your response to Interrogatory DBP/USPS-124.

Your response did not show the labels and barcodes that would be affixed to the mailpiece for methods of mailing other than over the retail window. Please provide.

DBP/USPS-470 Please refer to your response to Interrogatory DBP/USPS-124 subpart a. Please confirm, or explain if you are unable to confirm, that for entry by other than by an APC or over a retail window, the mailpiece must be prepared online.

DBP/USPS-471 Please refer to your response to Interrogatory DBP/USPS-124 subpart e. Your response did not discuss or provide copies of the forms utilized for the methods by which Insured mailpieces will be accounted for when given to the delivery carriers at a given post office.

DBP/USPS-472 Please refer to your response to Interrogatory DBP/USPS-124. It is proposed in this Docket to change the necessity of obtaining the addressee's signature from parcels insured for \$50.01 or more to those insured for \$200.01 or more. Please indicate how it is proposed under the proposed regulations to mark each of the mailpieces that are presented in any authorized manner and for any authorized value of insurance. Please provide copies of the marking.

DBP/USPS-473 Please refer to your response to Interrogatory DBP/USPS-124. It is proposed in this Docket to obtain a delivery scan for all mailpieces insured for \$200 or less.

[a] Since this will now require an identifying number and barcode for mailpieces insured for \$50 or less, will it now be possible to obtain a return receipt for this type of mailpiece?

[b] If not, why not?

DBP/USPS-474 Please refer to your response to Interrogatory DBP/USPS-124 subpart e. Your response indicated that parcels insured for \$50 or less [namely, unnumbered packages] will be delivered it can be left at a secure location.

[a] Will this now apply to parcels insured for \$200 or less?

[b] If not, why not?

DBP/USPS-475 Please refer to your response to Interrogatory APWU/USPS-T32-10. Since one of the categories in EXFC mailpieces is handwritten addresses, please explain why that same percentage would not also apply to the first question asked for in this Interrogatory.

DBP/USPS-476 Please refer to your response to Interrogatory DBP/USPS-255.

[a] If the object of the Postal Service is to eliminate window service for the mailing of single-piece Bound Printed Matter mailpieces, will a mailer be able to obtain a Certificate of Mailing or any of the other ancillary services that require or permit window services if the postage is prepaid by a postage meter.

[b] Please explain how the transaction will be made.

[c] Please provide the rationale for permitting window services.

DBP/USPS-477 Please refer to your response to Interrogatory DBP/USPS-287 subpart d. Please explain how it is possible for the average days for delivery for Post Office to Post Office Next Day to be delivered in less than one day. It would appear to me that it would require a certain percentage of the articles to be delivered on the date of mailing.

DBP/USPS-478 Please refer to your response to Interrogatory DBP/USPS-287 subpart d.

[a] Please provide a breakdown for Express Mail that has a service guarantee of three or four days showing the percentage of the mail that is delivered in one calendar day, two calendar days, three calendar days, four calendar days, and five or more calendar days. Provide separate data for PO-PO vs. PO-Addressee mail.

[b] Please confirm, or explain if you are unable to confirm, that most, if not all, of the three and four day delivery guarantees are as a result of the inability to deliver Express Mail on a Sunday or holiday at the delivery office.

[c] Based on the response to subpart b above, please indicate the reasons how three and four day guaranteed mail can be delivered in one or two days.

DBP/USPS-479 Please refer to your response to Interrogatory DBP/USPS-171.

[a] Please advise the validity of Special Delivery stamps since that service is no longer available, with either domestic or international mail.

[b] What use may a mailer who possesses Special Delivery stamps make of them?

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 7, 2006
