

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate Commission  
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EVOLUTIONARY NETWORK DEVELOPMENT]  
SERVICE CHANGES, 2006]

DOCKET NO. N2006-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES  
POSTAL SERVICE [DBP/USPS-96-99]

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 9, 2006  
N20061V96

Respectfully submitted,

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

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DBP/USPS-96

Please refer to the response to Interrogatory DBP/USPS-93.

Please provide the specific data that was originally requested and provided in response to Interrogatory DBP/USPS-14 for the listing of the 1900+ facilities that was provided to correct that listing. The following is the data that was originally requested:

**DBP/USPS-14**

Please provide a listing of all mail processing facilities including the following information as a minimum: [1] Type of facility [2] Name of the facility [3] City and state in which it is located [4] ZIP Code range of the mail that is processed at the facility.

The only data that was provided on the listing of 1900+ facilities was the site and the ZIP Code. The type of facility, City and State in which the facility is located, and the ZIP Code range of the mail that is processed at that facility were not provided.

DBP/USPS-97                      Please refer to your response to Interrogatory DBP/USPS-94 subpart a.

[a]     Please explain why the type of facilities listing was changed from a listing of "mail processing facilities" to a listing of all facilities "thought to contain one or more pieces of automated mail sortation equipment."

[b]     Will those two definitions produce the same listing of facilities?

[c]     If not, provide the differences between the types of facilities that would appear on a listing for each definition.

[d]     If the definition, "thought to contain one or more pieces of automated mail sortation equipment." is not a proper definition for "mail processing facilities", please provide the full listing of all mail processing facilities together with the data shown in Interrogatory DBP/USPS-14.

DBP/USPS-98                      Please refer to your response to Interrogatory DBP/USPS-94 subpart a. Please provide a listing and an explanation of the function of all pieces of automated mail sortation equipment that are in use.

DBP/USPS-99                      Please refer to your response to Interrogatory DBP/USPS-94 subpart f. Please advise the specific piece or pieces of automated mail sortation equipment that are in use at the Englewood NJ 07631 facility.

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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 9, 2006

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