

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN
(DBP/USPS-459 THROUGH 461, 475 AND 480 THROUGH 482)
(August 21, 2006)

The United States Postal Service hereby provides its institutional responses to the above-listed interrogatories, filed on August 7, 2006.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-459

[a] Please confirm, or explain if you are unable to confirm, that all of the stamps that have been issued in the past are receipts for a certain value and do not represent a particular service even though the denomination may have been chosen for a particular reason at the time of issue.

[b] Please confirm, or explain if you are unable to confirm, that the Forever Stamp proposal will only be the second time that the Postal Service is selling a specific service and will honor that service at any time in the future [the first time was the previous concept of the International Reply Coupon which has now changed and is no longer valid indefinitely].

RESPONSE

- (a) The Postal Service has not researched its archives for the purpose of determining whether all postage stamps ever issued by it or the Post Office Department were for a certain value and did not represent a particular service, even though certain denominations may have been chosen for a particular reason at the time of issue. Whether or not that is the case is not material to the issues raised by the Forever Stamp proposal.
- (b) The proposition posed in your question is a plausible one. Whether or not that is the case is not material to the issues raised by the Forever Stamp proposal. The Postal Service has not researched its archives for the purposes of making such a determination.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-460

[a] Please confirm, or explain if you are unable to confirm, that the computer generated stamps are only issued in certain specific values.

[b] Please confirm, or explain if you are unable to confirm, that a 39¢ computer generated stamp will require a regular 3¢ stamp to mail a one ounce letter once this Docket is approved.

[c] Has any consideration been given or evaluated to allow users of computer generated stamps to prepare stamps that would have the characteristics of the Forever Stamp?

[d] If so, please discuss. If not, why not?

RESPONSE

(a) Confirmed.

(b) Assuming the basic First-Class Mail rate is increased from 39 cents to 42, the increase has the same impact on holders of regular 39-cent postage stamps and PC-Postage 39-cent stamps.

(c) No.

(d) Please see the response to DBP/USPS-334. The Postal Service has focused exclusively on developing and implementing the concept described in the testimony of witness Taufique (USPS-T-48). Other proposals would require the examination of issues that go beyond those which the Postal Service is prepared to examine at this time.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-461

[a] Has any consideration been given or evaluated to allow users of postage meters to prepare "stamps" that would have the characteristics of the Forever Stamp?

[b] If so, please discuss. If not, why not?

RESPONSE

(a-b) No consideration has been given to extending the concept to meters or permit imprint. The testimony of witness Taufique (USPS-T-48) explains the motivation behind the proposed concept. The same rate change transitional issues do not arise with respect to other postage indicia.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

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.

RESPONSE

It is impossible from this question to tell what "that same percentage" is or what the "first question asked for in this Interrogatory . . ." is.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-480 This Interrogatory relates to the Forever Stamp proposal. Please confirm, or explain if you are unable to confirm, that in the last 51-plus years¹ every postage stamp, postal/stamped card, and stamped envelope that has been issued and/or sold by the Postal Service has been valid for any use for which postage stamps are valid except for the following:

1. Air Mail stamps/cards/envelopes which were restricted to use on Air Mail articles but which are now valid for any use since Air Mail was eliminated as a mail classification some 30 years ago.
2. Fifteen-cent Certified Mail stamps which were issued in 1955 to pay the then 15¢ Certified Mail fee.
3. Special Delivery stamps which were issued to pay the Special Delivery fee. Special Delivery is no longer available as a service.
4. Service imprinted pre-cancelled stamps which may not be utilized without holding a special mailing permit.

RESPONSE

That may well be the case. However, the Postal Service has not conducted the archival research necessary to develop a definitive response to a question that has no material bearing on the issues raised by its Forever Stamp proposal.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-481

[a] Is it the intention of the Postal Service to fully enforce the literal interpretation of the regulations that will be established for the Forever Stamp?

[b] If not, please explain.

RESPONSE

In the absence of a meeting of the minds as to what would constitute *full* enforcement, and what would constitute a *literal* interpretation of regulations that have not yet been finalized, it is impossible to answer this question.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-482

Please advise the regulations that the Postal Service intends to issue for the Forever Stamp.

RESPONSE

At an appropriate time in the future, the Postal Service will publish proposed DMM regulations in the Federal Register. At that time, one will be able to see what they are.