

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-566-598]

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 28, 2006

Respectfully submitted,

R20061CCC566

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

DBP/USPS-566 Please refer to your response to Interrogatory DBP/USPS-477. Please confirm, or explain if you are unable to confirm, that if a PO-PO Next Day Express Mail article was sent from post office A on a Monday and it arrived at the window at the destination post office B at 4 PM Monday it would count as being delivered in zero days even though it arrived six hours after the 10 AM guaranteed delivery time.

DBP/USPS-567 Please refer to your response to Interrogatory DBP/USPS-459. Your reply to my Interrogatory was not response to the questions asked. The questions asked

related to conceptual ideas of the values that postage stamps sold retain. Since the Forever Stamp proposal will be changing the postage value assigned to stamps and the use that may be made of the stamps, I am trying to show that the Forever Stamp will be a change in the Postal Service's longstanding policies. As such it is material to the issues raised by the Forever Stamp proposal and a response is desired to the original Interrogatory.

DBP/USPS-568 Please refer to your response to Interrogatory DBP/USPS-475. The original APWU Interrogatory and response is as follows:

APWU/USPS-T32-10 On page 13 of your testimony you state that a “significant percentage” of single piece letters have handwritten addresses. How many letters in the test year had handwritten addresses? What percentage of handwritten letters are automation compatible?

RESPONSE

We do not have the data on the number of single-piece letters with hand written addresses.

The Postal Service stated that they do not have data on the number of single-piece letters that have hand-written addresses.

[a] Please confirm, or explain if you are unable to confirm, that a number of the EXFC single-piece letter categories have handwritten addresses.

[b] Please confirm, or explain if you are unable to confirm, that the various percentages utilized in the EXFC Program have been designed to match that which occurs in the overall mail stream.

[c] Please explain why the response to the first question asked in Interrogatory APWU/USPS-T32-10 could not have been given as the sum of the percentages of EXFC categories that utilize hand-written addresses multiplied by the total mail volume to obtain the number of pieces with hand-written addresses.

DBP/USPS-569 Please refer to your response to Interrogatory DBP/USPS-480. Your reply to my Interrogatory was not responsive to the questions asked. The questions asked related to conceptual ideas that all of the stamps that have been issued in the last 51-plus years have been valid for all postage use except for the examples provided in items 1 through 4. Since the Forever Stamp proposal could be considered to fall into the same as the categories 1 through 4 in the original Interrogatory and the use that may be made of the stamps, I am trying to show that the Forever Stamp will be a change in the Postal Service's

longstanding policies. As such it is material to the issues raised by the Forever Stamp proposal and a response is desired to the original Interrogatory.

DBP/USPS-570 Please refer to your response to Interrogatory DBP/USPS-482. Please provide copies of the draft DMM regulations that exist at this time or indicate that there are none at this time.

DBP/USPS-571 Please refer to your response to Interrogatory DBP/USPS-462. Please advise whether the failure to include Delivery Confirmation and/or Signature Confirmation and/or Collect on Delivery Mail in your response to Interrogatory DBP/USPS-121 subparts b and c is because these three categories are not considered to be Accountable Mail or because they are not trackable on the Internet or and/or by telephone or both.

DBP/USPS-572 Please refer to your response to Interrogatory DBP/USPS-471.

[a] Please explain why Insured Mail is not included in the categories that are shown in the second column of PS Form 3867.

[b] Since in the past, Insured Mail parcels were not accounted for in this manner, please advise when the change was made and the reasons for now including Insured Mail in this procedure.

DBP/USPS-573 Please refer to your response to Interrogatory DBP/USPS-476.

Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-574 Please refer to your response to Interrogatory DFC/USPS-T38-15.

Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-575 Please refer to your response to Interrogatory DFC/USPS-T38-16.

[a] Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

[b] Please confirm, or explain if you are unable to confirm, that once a customer who is aware that his/her single-piece/non-presort Bound Printed Matter mailpiece will require, for example, \$3.67 in postage is to just issue a PVI strip and take the mailpiece as opposed to obtaining 3-\$1 stamps, 1-50¢ stamp, 1-10¢ stamp, 1-5¢ stamp, and 1-2¢ stamp, and then waiting while the customer affixed the stamps, and then canceling the stamps, and then affixing a "00" PVI strip to cover the aviation security requirement.

DBP/USPS-576 Please refer to your response to Interrogatory DFC/USPS-T38-17.

Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-577 Please refer to your response to Interrogatory DFC/USPS-T38-18.

[a] Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

[b] Please advise whether the "further consideration" refers to action that will be taken in this Docket or in some future, yet to be filed, Docket.

[c] Please confirm, or explain if you are unable to confirm, that even if Bound Printed Matter is considered as a "commercial offering", there will still be a number of instances which will still require the services of the retail window.

DBP/USPS-578 Please refer to your response to Interrogatory DFC/USPS-66.

Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-579 Please refer to your response to Interrogatory DFC/USPS-68. Please provide the requested information. It is up to the proponent of the Interrogatory to determine whether or not to present the "popularity contest" argument once the data has been received.

DBP/USPS-580 Please refer to your response to Interrogatory DBP/USPS-483. Please advise the significance and consequences to the mailer by the condition that you refer to as "the service will not be offered at retail window."

DBP/USPS-581 Please refer to your response to Interrogatory DBP/USPS-484. Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-582 Please refer to your response to Interrogatory DBP/USPS-485. Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-583 Please refer to your response to Interrogatory DBP/USPS-486. Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38. Please respond to the original Interrogatory and advise the present status of the plans and

please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-584 Please refer to your response to Interrogatory DBP/USPS-487. Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-585 Please refer to your response to Interrogatory DBP/USPS-419. Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-586 Please refer to your response to Interrogatory DBP/USPS-420. Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38, I would appreciate receiving a response to the original Interrogatory that was asked and not make an assumption that the revised footnote 2 filed on August 10, 2006 will moot the need for a response to the Interrogatory. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-587 Please refer to your response to Interrogatory DBP/USPS-421. Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38, I would appreciate receiving a response to the original Interrogatory that was asked and not make an assumption that the revised footnote 2 filed on August 10, 2006 will moot the need for a response to the Interrogatory. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-588 Please refer to your response to Interrogatory DBP/USPS-422. Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38, I would appreciate receiving a response to the original Interrogatory that was asked and not make an assumption that the revised footnote 2 filed on August 10, 2006 will moot the need for a response to the Interrogatory. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-589 Please refer to your response to Interrogatory DBP/USPS-423. Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38, I would appreciate receiving a response to the original Interrogatory that was asked and not make an assumption that the revised footnote 2 filed on August 10, 2006 will moot the need for a response to the Interrogatory. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-590 Please refer to your response to Interrogatory DBP/USPS-424. Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38, I would appreciate receiving a response to the original Interrogatory that was asked and not make an assumption that the revised footnote 2 filed on August 10, 2006 will moot the need for a response to the Interrogatory. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-591 Please refer to your response to Interrogatory DBP/USPS-425. Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38, I would appreciate receiving a response to the original Interrogatory that was asked and not make an assumption that the revised footnote 2 filed on August 10, 2006 will moot the need for a response to the Interrogatory. Please respond to the original Interrogatory and advise the

present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-592 Please refer to your response to Interrogatory DBP/USPS-426. Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38, I would appreciate receiving a response to the original Interrogatory that was asked and not make an assumption that the revised footnote 2 filed on August 10, 2006 will moot the need for a response to the Interrogatory. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-593 Please refer to your response to Interrogatory DBP/USPS-428. Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38, I would appreciate receiving a response to the original Interrogatory that was asked and not make an assumption that the revised footnote 2 filed on August 10, 2006 will moot the need for a response to the Interrogatory. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-594 Please refer to your response to Interrogatory DBP/USPS-429. Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38, I would appreciate receiving a response to the original Interrogatory that was asked and not make an assumption that the revised footnote 2 filed on August 10, 2006 will moot the need for a response to the Interrogatory. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-595 Please refer to your response to Interrogatory DBP/USPS-431. Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38, I would appreciate receiving a response to the original Interrogatory that was asked and not make an

assumption that the revised footnote 2 filed on August 10, 2006 will moot the need for a response to the Interrogatory. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-596 Please refer to your response to Interrogatory DBP/USPS-432. Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38, I would appreciate receiving a response to the original Interrogatory that was asked and not make an assumption that the revised footnote 2 filed on August 10, 2006 will moot the need for a response to the Interrogatory. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-597 Please refer to your response to Interrogatory DBP/USPS-433. Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38, I would appreciate receiving a response to the original Interrogatory that was asked and not make an assumption that the revised footnote 2 filed on August 10, 2006 will moot the need for a response to the Interrogatory. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

DBP/USPS-598 Please refer to your response to Interrogatory DBP/USPS-434. Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38, I would appreciate receiving a response to the original Interrogatory that was asked and not make an assumption that the revised footnote 2 filed on August 10, 2006 will moot the need for a response to the Interrogatory. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

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 28, 2006
