

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-640-673]

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."

September 26, 2006

Respectfully submitted,

R20061EEE640

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

DBP/USPS-640
601.

Please refer to your response to Interrogatory DBP/USPS-

[a] Please confirm, or explain if you are unable to confirm, that there are a number of instances where mailpieces will receive a scan while in transit such as "In Transit" or an "Arrival at Unit" scan.

[b] Please confirm, or explain if you are unable to confirm, that there are instances where these in transit scans are performed on a number of mailpieces at the same time.

[c] Please confirm, or explain if you are unable to confirm, that when these scans are required to be made of a group of mailpieces that the mailpieces will be segregated while the individual scans are made.

[d] Please confirm, or explain if you are unable to confirm, that while this group of mailpieces is individually scanned there may be a delay which will cause that group of mailpieces to miss a scheduled trip and therefore be delayed.

DBP/USPS-641 Please refer to your response to Interrogatory DBP/USPS-602.

Please confirm, or explain if you are unable to confirm, that every individual piece of mail which has been processed into delivery point sequencing [DPS] and arriving at a delivery unit will not be examined individually by the delivery carrier until he/she is out on the delivery route.

DBP/USPS-642 Please refer to your response to Interrogatory DBP/USPS-619.

[a] Please confirm, or explain if you are unable to confirm, that DMCS Section 941.21 states that "Certified Mail service is available for matter mailed as First-Class Mail."

[b] Please confirm, or explain if you are unable to confirm, that First-Class Mail may utilize Certified Mail because DMCS Section 941.21 states that "Certified Mail service is available for matter mailed as First-Class Mail."

[c] Please confirm, or explain if you are unable to confirm, that mail services other than First-Class Mail such as, Express Mail, Periodicals, Standard Mail, Package Services may not utilize Certified Mail service because they are not listed in those services shown in DMCS Section 941.21,

[d] Please confirm, or explain if you are unable to confirm, that if the Postal Service intended that if mail services other than First-Class Mail such as, Express Mail, Periodicals, Standard Mail, Package Services were to be able to utilize Certified Mail service they would also have to be listed in DMCS Section 941.21,

DBP/USPS-643 Please refer to your response to Interrogatory DBP/USPS-619 subpart c.

Please explain why you believe that other uses other than the intended use for the Forever Stamp will be authorized without being provided for in the DMCS wording.

DBP/USPS-644 Please refer to your response to Interrogatory DBP/USPS-604. You ask me to reread the response to subpart [c] of DBP/USPS-510. That response indicates that there is a possible ambiguity in the term "first ounce". If I reread the response to subpart [c], I must also reread the response to subpart [b] which states very specifically what the correct interpretation of the Forever Stamp policy is and further states that the Postal Service is only considering making a change.

After responding to Interrogatories DBP/USPS-642 and 643, please re-evaluate and re-respond to the original Interrogatory DBP/USPS-604.

DBP/USPS-645 Please refer to your response to Interrogatory DBP/USPS-605 subpart a.

Please confirm, or explain if you are unable to confirm, that the level of confusion to the mailing public will also be considered.

DBP/USPS-646 Please refer to your response to Interrogatory DBP/USPS-605.

Please confirm, or explain if you are unable to confirm, that the response made to subpart b of Interrogatory DBP/USPS-510 is still the current status of the Postal Service's Forever Stamp implementation plan.

DBP/USPS-647 Please refer to your response to Interrogatory DBP/USPS-606.

Please explain why my notion that the intended purpose of the Forever Stamp is the only use that will be tolerated is a mistaken notion based on the response to subpart [b] of Interrogatory DBP/USPS-510 which states very specifically what the correct interpretation of the Forever Stamp policy is and further states that the Postal Service is only considering making a change.

DBP/USPS-648 Please refer to your response to Interrogatory DBP/USPS-607.

You indicate that that is one option. Please provide all of the other options that could exist that are compliant with the current Postal Service interpretation of the use of Forever Stamps as enumerated in the response to subpart b of Interrogatory DBP/USPS-510.

DBP/USPS-649 Please refer to your response to Interrogatory DBP/USPS-608.

Please explain why you were not able to fully confirm the scenario presented in the original Interrogatory DBP/USPS-608 since it appears to be in full compliance with existing Postal Service regulations for shortpaid/unpaid mail and the current Postal Service interpretation of the use that may be made of the Forever Stamp as provided in the response to subpart b of Interrogatory DBP/USPS-510.

DBP/USPS-650 Please refer to your response to Interrogatory DBP/USPS-609.

Please explain why you were not able to fully confirm the scenario presented in the original Interrogatory DBP/USPS-609 since it appears to be in full compliance with existing Postal Service regulations for shortpaid/unpaid mail and the current Postal Service interpretation of the use that may be made of the Forever Stamp as provided in the response to subpart b of Interrogatory DBP/USPS-510.

DBP/USPS-651 Please refer to your response to Interrogatory DBP/USPS-610.

Please explain why you were not able to fully confirm the scenario presented in the original Interrogatory DBP/USPS-610 since it appears to be in full compliance with existing Postal Service regulations for shortpaid/unpaid mail and the current Postal Service interpretation of the use that may be made of the Forever Stamp as provided in the response to subpart b of Interrogatory DBP/USPS-510.

DBP/USPS-652 Please refer to your response to Interrogatory DBP/USPS-611.

Please explain why you were not able to fully confirm the scenario presented in the original Interrogatory DBP/USPS-611 since it appears to be in full compliance with existing Postal Service regulations for shortpaid/unpaid mail and the current Postal Service interpretation of the use that may be made of the Forever Stamp as provided in the response to subpart b of Interrogatory DBP/USPS-510.

DBP/USPS-653 Please refer to your response to Interrogatory DBP/USPS-612.

Please explain why you were not able to fully confirm the scenario presented in the original Interrogatory DBP/USPS-612 since it appears to be in full compliance with existing Postal Service regulations for shortpaid/unpaid mail and the current Postal Service interpretation of the use that may be made of the Forever Stamp as provided in the response to subpart b of Interrogatory DBP/USPS-510.

DBP/USPS-654 Please refer to your response to Interrogatory DBP/USPS-613.

Please explain why you were not able to fully confirm the scenario presented in the original Interrogatory DBP/USPS-613 since it appears to be in full compliance with existing Postal Service regulations for shortpaid/unpaid mail and the current Postal Service interpretation of the use that may be made of the Forever Stamp as provided in the response to subpart b of Interrogatory DBP/USPS-510.

DBP/USPS-655 Please refer to your response to Interrogatory DBP/USPS-614.

Please explain why you were not able to fully confirm the scenario presented in the original Interrogatory DBP/USPS-614 since it appears to be in full compliance with existing Postal Service regulations for shortpaid/unpaid mail and the current Postal Service interpretation of the use that may be made of the Forever Stamp as provided in the response to subpart b of Interrogatory DBP/USPS-510.

DBP/USPS-656 Please refer to your response to Interrogatory DBP/USPS-615.

Please explain why you were not able to fully confirm the scenario presented in the original Interrogatory DBP/USPS-615 since it appears to be in full compliance with existing Postal Service regulations for shortpaid/unpaid mail and the current Postal Service interpretation of the use that may be made of the Forever Stamp as provided in the response to subpart b of Interrogatory DBP/USPS-510.

DBP/USPS-657 Please refer to your response to Interrogatory DBP/USPS-616.

Please explain how the you are able to make a "positive" statement that "mailers will not be penalized for using it as postage for other mail pieces in the R2006-1 rate cycle" when that statement is in direct conflict with the statement made in response to subpart b of Interrogatory DBP/USPS-510 where you state that the Postal Service is only considering giving postage credit for such uses.

DBP/USPS-658 Please refer to your response to Interrogatory DBP/USPS-616.

[a] Please explain why you believe that implementing language regarding postage credit for unintended purposes [should the Postal Service change the position provided in response to subpart b of Interrogatory DBP/USPS-510 which stated that such use was being considered] could be published elsewhere other than the DMCS.

[b] Please advise where you believe the publication would take place.

DBP/USPS-659 Please refer to your response to Interrogatory DBP/USPS-618.

You state that there is a misunderstanding of the current policy. What is the current policy and does it differ from the very clear policy specified in response to subpart b of Interrogatory DBP/USPS-510?

DBP/USPS-660 Please refer to your response to Interrogatory DBP/USPS-620.

[a] What are the Postal Service's stated intentions with respect to any unintended postage use of the forever stamp for the Docket No. R2006-1 rate cycle? Please explain how this intention complies with the interpretation provided in response to subpart b of Interrogatory DBP/USPS-510.

[b] Please confirm, or explain if you are unable to confirm, that the term R2006-1 rate cycle would be the time frame when the single-piece First-Class Mail rate would be 42¢ [assuming that rate is approved].

DBP/USPS-661 Please refer to your response to Interrogatory DBP/USPS-621.

The original Interrogatory referred to was DBP/USPS-516.

DBP/USPS-662 Please refer to your response to Interrogatory DBP/USPS-622.

[a] You state that the policy for unintended postage use for the purposes of the R2006-1 rate cycle is already clear. What is the Postal Service's policy with respect to any unintended postage use of the forever stamp for the Docket No. R2006-1 rate cycle? Please explain how this intention complies with the interpretation provided in response to subpart b of Interrogatory DBP/USPS-510.

[b] Please explain why you were not able to confirm the response to subpart b of Interrogatory DBP/USPS-622.

DBP/USPS-663 Please refer to your response to Interrogatory DBP/USPS-624.

[a] Please confirm, or explain if you are unable to confirm, that there is a December 2005 version of the template Notice 3-A and that that is the latest version.

[b] The response to subpart b of Interrogatory DBP/USPS-624 failed to provide the specific wording that serves to provide additional guidelines to postal acceptance clerks as opposed to reformatting the DMM regulations to place them in a more convenient format or to provide a convenient way to measure the various mailpieces.

DBP/USPS-664 Please refer to your response to Interrogatory DBP/USPS-625.

[a] Please confirm, or explain if you are unable to confirm, that the responses made to subparts a, c, and d of Interrogatory DBP/USPS-540 no longer apply to the reworded Interrogatory DBP/USPS-625 and that the only reason for the implementation of the nonmachinable surcharge to the mailpiece described in Interrogatory DBP/USPS-625 is as noted in the response to Interrogatory DBP/USPS-625 which refers to the ability of the clasp to catch on something else during processing as indicated by the response, "Yes" to subpart b of Interrogatory DBP/USPS-540.

[b] Please confirm, or explain if you are unable to confirm, that if a mailer affixes a piece of tape over the clasp on the mailpiece described in Interrogatory DBP/USPS-625 so that there will be no ability for the clasp to catch on something else during processing that the mailpiece will no longer require payment of the nonmachinable surcharge.

DBP/USPS-665 Please refer to your response to Interrogatory DBP/USPS-626.

[a] Please explain how the answer to Interrogatory DBP/USPS-541 speaks for itself. Have any individuals performed direct measurements of lengths and widths of thick envelopes vs. indirect measurements of the envelope thickness?

[b] If not, why not?

[c] Please explain the term parallax as it relates to observations made of the reading of a ruler.

[d] Please confirm, or explain if you are unable to confirm, that the indirect measurement of the thickness of a thick envelope will have a greater parallax error than the direct measurement of the length and width of the same envelope.

DBP/USPS-666 Please refer to your response to Interrogatory DBP/USPS-629.

Please confirm, or explain if you are unable to confirm, that if the Commission and Board of Governors approve the proposed shape based rates for single-piece First-Class Mail that the only tools that the retail window clerks will have to determine whether a mailpiece is eligible for the letter rate vs. the flat rate vs. the parcel rate will be a Notice 3-A template, a ruler, and the DMM to determine the rate consequences of the measurements.

DBP/USPS-667 Please refer to your response to Interrogatory DBP/USPS-633.

Please explain the rationale for the belief that the current procedures with regard to Insurance fulfill its needs.

DBP/USPS-668 Please refer to your response to Interrogatory DBP/USPS-637.

I am somewhat confused by the answers to Interrogatory DBP/USPS-637. The response to subpart a appears to state that the conversion of a letter-shaped mailpiece with one or more of the nonmachinable characteristics will pay the rate for flat-shaped mail regardless of the weight [any weight up to 3.5 ounces]. The response to subpart b appears to indicate that the conversion will only take place for letter-shaped mailpieces of one ounce or less. Please clarify.

DBP/USPS-669 Please refer to your response to Interrogatory DBP/USPS-639.

Based on your response stating "No and no" leads me to believe that you misread the intent of my Interrogatory. The intent of the question was to confirm that all of the questions and statements that were presented in the February 2006 attachment to the response to Interrogatory DFC/USPS-T48-22 were considered by Witness Taufique and either adopted, modified, or rejected before preparing his T-48 Testimony and the subsequent Forever Stamp discovery.

For example, the February 2006 document discusses the possibility of charging a premium for the Forever Stamp or limiting the time period that it will be sold. Both of these have been evaluated and dismissed and therefore are not back on the table as a possibility.

Please clarify your response.

DBP/USPS-670 Please refer to your response to Interrogatory DBP/USPS-267.

OIG Report Number IS-AR-06-005 indicated that the \$1 telephone and Internet Change of Address filing fee was suspended.

- [a] When was the effective date of the waiver?
- [b] Is the waiver still in effect?
- [c] If not, when did it terminate?
- [d] If so, what are the plans, if any, for terminating it?
- [e] Please advise any specific geographical locations that are/were eligible for the waiver of the \$1 fee. Please specify whether the geographic restriction applies to either or both of the old or new address.

DBP/USPS-671 Please refer to your response to Interrogatory DBP/USPS-267.

OIG Report Number IS-AR-06-005 indicated that the \$1 telephone and Internet Change of Address filing fee was suspended and compensating controls were implemented to help reduce fraud.

- [a] Please provide full details of these compensating controls.

- [b] Please advise the cost of implementing these controls.
- [c] Please advise the success of these controls in preventing fraud.
- [d] Please advise why these compensating controls can not be implemented on a permanent basis to avoid the need for the \$1 verification fee.

DBP/USPS-672 Please refer to your response to Interrogatory DBP/USPS-284.

The New York Metro Area provides extended retail service window hours at many facilities throughout the Area of 7 PM Weekdays and 4 PM Saturday.

- [a] Have any of the other Areas provided a similar extension of retail service window hours in a similar manner as the New York Metro Area even though the specific times may be different?
- [b] If so, please provide the details.
- [c] Please provide a listing broken out by Area showing the number of facilities that have these extended hours.
- [d] Please discuss the reasons behind the implementation of this service.
- [e] Please discuss the success or lack of success of this program.
- [f] Please discuss any plans to expand or reduce the number of facilities that have these extended hours.

DBP/USPS-673 Please refer to your response to Interrogatory DBP/USPS-285.

Please advise specifically if there are any plans to expand or reduce the number of Automated Postal Centers [APCs] in service.

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 September 26, 2006
