

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

STAMPED STATIONERY CLASSIFICATION

DOCKET NO. MC2006-7

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-1 through 8]

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 the extent that a reference is made in the response 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 or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, 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."

February 23, 2007

Respectfully submitted,

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

DBP/USPS-1 Please provide a listing of all of the Premium Stamped Stationery and Premium Stamped Cards that have been issued by the United States Postal Service since 1971. This listing should contain the following data fields as a minimum [the term package is defined at the item that was normally sold to the public and for most of the Premium Stamped Cards was 20]:

[a] Date of Issue

[b] Description of the Issue

- [c] Number of different designs in the sale package
- [d] Number of items in the package that was sold to the public
- [e] Public selling price for the package
- [f] Value of the postage stamp on each piece
- [g] Number of packages printed
- [h] Number of packages sold
- [i] Number of packages that were sold at the Stamp Fulfillment Services [or its predecessor] in Kansas City

DBP/USPS-2 Please provide a listing of any postal stationery or stamped cards that have been issued since 1971 and which were sold at the standard price for that category of stationery but which contain designs or imprinting other than the actual stamp or copyright notice. Please provide images of the item.

DBP/USPS-3 Please advise all instances where the public selling price for Premium Stamped Stationery and/or Premium Stamped Cards has changed for any single issue. Please provide the full details and the reason or reasons why the price was changed.

DBP/USPS-4 Please refer to the data that was provided in response to Interrogatory DBP/USPS-1 subparts g and h.

[a] Please confirm that if the entry in subpart g is greater than the entry in subpart h it would indicate packages that were printed but not sold.

[b] Please advise what use was made of the unsold packages.

[c] Please discuss how the cost of printing the unsold packages is/was factored into the cost data.

DBP/USPS-5 Please confirm, or explain if you are unable to confirm, that there were no Premium Stamped Stationery and Premium Stamped Cards that were issued prior to 1971.

DBP/USPS-6 Please discuss how the number of packages to be printed is determined.

DBP/USPS-7 Please provide full details of any expenses that were incurred for any costs that required payment outside of the Postal Service other than the direct costs of printing and packaging of any of the Premium Stamped Stationery and Premium Stamped Cards that have been issued by the United States Postal Service since 1971. This would include, but is not limited to, payment for the use of copyrighted designs or subjects.

DBP/USPS-8 Please provide an estimate of the percentage of Premium Stamped Stationery and Premium Stamped Cards that are sold at each of the following places:

- [a] The Stamp Fulfillment Services [or its predecessor] in Kansas City
- [b] Philatelic windows
- [c] Standard retail sales window
- [d] Other locations [please specify]

If there is a significant variation in the data over the number of years, please provide yearly data.