

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

STAMPED STATIONERY AND
STAMPED CARDS CLASSIFICATION

DOCKET NO. MC2006-7

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-20-31]

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."

April 2, 2007

Respectfully submitted,

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

DBP/USPS-20 Please refer to your responses to Interrogatories
DBP/USPS-1 and 2.

[a] Please indicate which of the listed items are still on sale at the Stamp Fulfillment Services in Kansas City.

[b] Please indicate which of the listed items are still on sale at local post offices throughout the country.

[c] Please indicate which of the listed items are still on sale at other venues. Please identify the venues.

DBP/USPS-21

[a] For each of the items that are still on sale or which do not represent a final figure, please indicate the date for which the numbers sold as provided in response to Interrogatory DBP/USPS-1. Please provide updated figures for number sold.

[b] For each of the items that are still on sale, please indicate whether the sale of the item has dropped off from the early sales period and attempt to quantify the sales levels.

DBP/USPS-22 Please refer to your response to Interrogatory DBP/USPS-1 and confirm that the postage value for cards sold during 2005 was 23¢ and not 24¢.

DBP/USPS-23 I understand that the 2006 Florida Wetland cards are sold out at the Stamp Fulfillment Services in Kansas City. The data provided in response to Interrogatory DBP/USPS-1 shows some 22132 units or 73.8% unsold. Please explain.

DBP/USPS-24 Please refer to the following chart that was prepared using the data that was provided in response to Interrogatory DBP/USPS-1.

Please confirm, or explain if you are not able to confirm, each of the following [please discuss each of the items as to the justification which allowed the price that was charged]

[a] Nine of the cards were sold for less than the minimum proposed price of 1 times the stamped card rate [a percent in the last column of less than 100%].

[b] Only eight of the cards were sold for more than 123.75 percent of the stamped card rate.

[c] Three of the cards have been sold for as little as 48.75 percent of the stamped card rate.

	UNIT POSTAGE	NUMBER OF ITEMS	TOTAL POSTAGE	SELLING PRICE	TOTAL COST OF ITEMS WITHOUT POSTAGE	COST OF A SINGLE ITEM WITHOUT POSTAGE	PERCENT OF THE COST OF A STAMPED CARD
2006							
Baseball	\$0.24	20	\$4.80	\$9.95	\$5.15	\$0.2575	107.29%
Super Heroes	\$0.24	20	\$4.80	\$9.95	\$5.15	\$0.2575	107.29%
Disney	\$0.24	20	\$4.80	\$9.95	\$5.15	\$0.2575	107.29%
Fla. Wetland	\$0.39	10	\$3.90	\$7.95	\$4.05	\$0.4050	168.75%
2005							
Disney	\$0.23	20	\$4.60	\$9.75	\$5.15	\$0.2575	111.96%
Sporty Cars	\$0.23	20	\$4.60	\$9.75	\$5.15	\$0.2575	111.96%
Let's Dance	\$0.23	20	\$4.60	\$9.75	\$5.15	\$0.2575	111.96%
2004							
Cloudscapes	\$0.23	20	\$4.60	\$9.75	\$5.15	\$0.2575	111.96%
Disney	\$0.23	20	\$4.60	\$9.75	\$5.15	\$0.2575	111.96%
American Indian	\$0.23	20	\$4.60	\$9.75	\$5.15	\$0.2575	111.96%
2003							
Old Glory	\$0.23	20	\$4.60	\$9.75	\$5.15	\$0.2575	111.96%
Music Makers	\$0.23	20	\$4.60	\$9.75	\$5.15	\$0.2575	111.96%
SE Lighthouses	\$0.23	20	\$4.60	\$9.75	\$5.15	\$0.2575	111.96%
2002							
Snowmen	\$0.23	20	\$4.60	\$9.75	\$5.15	\$0.2575	111.96%
Teddy Bears	\$0.23	20	\$4.60	\$9.75	\$5.15	\$0.2575	111.96%
2001							
Playing Fields	\$0.21	10	\$2.10	\$6.95	\$4.85	\$0.4850	230.95%
Santas	\$0.21	20	\$4.20	\$9.25	\$5.05	\$0.2525	120.24%
That's All Folks	\$0.20	20	\$4.00	\$5.95	\$1.95	\$0.0975	48.75%
2000							
Baseball Legends	\$0.20	20	\$4.00	\$8.95	\$4.95	\$0.2475	123.75%
Deer	\$0.20	20	\$4.00	\$8.95	\$4.95	\$0.2475	123.75%
Road Runner	\$0.20	10	\$2.00	\$6.95	\$4.95	\$0.4950	247.50%
Adoption	\$0.20	10	\$2.00	\$6.95	\$4.95	\$0.4950	247.50%
Stars and Stripes	\$0.20	20	\$4.00	\$8.95	\$4.95	\$0.2475	123.75%
1999							
Victorian-Love	\$0.20	20	\$4.00	\$6.95	\$2.95	\$0.1475	73.75%
Daffy Duck	\$0.20	20	\$4.00	\$6.95	\$2.95	\$0.1475	73.75%
Trains	\$0.20	20	\$4.00	\$6.95	\$2.95	\$0.1475	73.75%
1998							
Ballet	\$0.20	10	\$2.00	\$5.95	\$3.95	\$0.3950	197.50%
Tropical Birds	\$0.20	20	\$4.00	\$6.95	\$2.95	\$0.1475	73.75%
Sylvester/Tweety	\$0.20	20	\$4.00	\$5.95	\$1.95	\$0.0975	48.75%
1997							
Movie Monsters	\$0.20	20	\$4.00	\$5.95	\$1.95	\$0.0975	48.75%
Love Variety	\$0.20	12	\$2.40	\$6.95	\$4.55	\$0.3792	189.58%
1996							
Endangered Species	\$0.20	15	\$3.00	\$11.95	\$8.95	\$0.5967	298.33%

Olympic Games	\$0.20	20	\$4.00	\$12.95	\$8.95	\$0.4475	223.75%
1995							
Civil War	\$0.20	20	\$4.00	\$7.95	\$3.95	\$0.1975	98.75%
Comic Strip	\$0.20	20	\$4.00	\$7.95	\$3.95	\$0.1975	98.75%
1994							
Legends of West	\$0.19	20	\$3.80	\$7.95	\$4.15	\$0.2075	109.21%
PREMIUM STAMPED STATIONERY							PERCENT OF THE COST OF A FIRST-CLASS LETTER
2005							
Garden Bouquet	\$0.37	12	\$4.44	\$14.95	\$10.51	\$0.8758	236.71%
2004							
Disney Friendship	\$0.37	12	\$4.44	\$14.95	\$10.51	\$0.8758	236.71%

DBP/USPS-25 Since all of the Premium Stamped Cards have sold for less than 2 times the stamped card rate, why is it necessary to ask for rates as high as 3 times the stamped card rate?

DBP/USPS-26 Please refer to your responses to Interrogatories DBP/USPS-1 and 2.

Please explain why you are making a distinction between those cards sold between 1989 and 1993 which did not feature designs from actually, separately issued postage stamps and those that were sold from 1994 to date which did.

DBP/USPS-27 Please refer to your responses to Interrogatory DBP/USPS-2.

Please confirm, or explain if you are unable to confirm, that the cards issued between 1989 and 1993 were all sold as single units and at a price of 50¢.

DBP/USPS-28 Please refer to your responses to Interrogatory DBP/USPS-2.

[a] Please confirm, or explain if you are unable to confirm, that the surface and Air Mail postal cards that were issued on June 29, 1972 had other images besides the stamp and that they were sold for the face value of the stamp. Please provide images of these cards.

[b] Please advise if there were any other similar issues.

DBP/USPS-29 Please confirm, or explain if you are unable to confirm, that the United States Postal Service has issued Air Letter sheets / Aerogrammes since 1947 and that the more recent issues have had various scenes in addition to the stamp and that these were all sold at the face value of the stamp.

DBP/USPS-30 Please refer to your responses to Interrogatories DBP/USPS-9 and 10.

[a] Please confirm, or explain if you are unable to confirm, that if the price was reduced from the existing levels there would be increased use by the general public for personal correspondence.

[b] Please discuss the extent to which sales to philatelists entered into the decision to issue Premium Postal Stationery and/or Cards

DBP/USPS-31 Please refer to your response to Interrogatory DBP/USPS-14.

Please confirm, or explain if you are unable to confirm, that had the proposed rates been in effect for the issuance of the Florida Wetland 2006 issue, it would have been sold for a minimum price of 62¢ each [39¢ postage plus 23¢ for one times the card rate] and a maximum price of \$1.08 each [39¢ postage plus 69¢ for three times the card rate].