

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-32-39]

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 3, 2007

Respectfully submitted,

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

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DBP/USPS-32 Please refer to your responses to Interrogatories  
DBP/USPS-1 and 2.

[a] Please confirm that the Number Printed/Number Sold/Number Sold SFS entries that are blank are that way because the information is not available.

[b] For any of the blank entries, please provide any estimates that are available as approximate numbers, ranges of numbers, or approximate percentages, such as "approximately 50,000" or "30,000 to 40,000" or "approximately 75% sold" etc.

DBP/USPS-33                      Please refer to your response to Interrogatory DFC/USPS-T1-1.

[a]     Please discuss that concept of "philatelic value" as it applies to the pricing of Premium Stamped Stationery and Cards.

[b]     Please confirm, or explain if you are unable to confirm, that a similar concept of "philatelic value" would apply to the existence of regular postage stamps, especially commemorative stamps.

[c]     Please confirm, or explain if you are unable to confirm, that all of the regular postage stamps, including commemorative stamps, are sold at the face value appearing on the stamp regardless of the "philatelic value" of that stamp.

DBP/USPS-34                      Please refer to your response to Interrogatory DFC/USPS-T1-4.

[a]     Please confirm, or explain if you are unable to confirm, that the Premium Stamped Stationery and Premium Stamped Cards are not philatelic items.

[b]     Please explain how items that are not philatelic items can have philatelic value.

DBP/USPS-35                      Please refer to your response to Interrogatory OCA/USPS-T1-13.

[a]     Please provide details on how the revenue figure of not exceeding \$2,700,000 was calculated.

[b]     Please provide the corresponding expenses that were incurred that matches the revenue figure of not exceeding \$2,700,000. Please provide details on how this response was calculated.

[c]     Please provide the corresponding value of the postage stamps that were on all of the items that were sold for a revenue figure of not exceeding \$2,700,000. Please provide details on how this response was calculated.

[d] Please advise the percentage of the value provided in response to subpart b above that represents the cost of providing postal services to the mailing of the referenced items. Please provide details on how this response was calculated.

DBP/USPS-36 Please refer to your response to Interrogatory OCA/USPS-T1-1.

[a] Please confirm, or explain if you are unable to confirm, that the average unit retail price as shown was determined by adding up the total cost of one of each of the items listed and dividing by the total number of items.

[b] For each of the nineteen items that are listed, please advise whether the item was sold as a single item or was sold in a multiple pack. If sold in a multiple pack, please provide details of the number of articles in the package and the total price, such as 12 sets for \$19.99 which would then be shown in the table as \$1.666.

[c] For each of the Stationery items 1 through 10, please indicate whether they would be considered to be a "normal" greeting card such as one that might be sent to wish someone a happy birthday or would be considered to be a note card which are designed for writing a complete message such as would be the same as writing on the Premium Stamped Stationery.

[d] Please confirm that the physical characteristics of Stationery items 11 through 14 are identical and only differ in the printing.

[e] Please explain in detail why it is believed that the quality of the available letter sheets is much lower than the quality of PSS. Please provide specific details including the type of paper, surface of the paper, thickness of the paper, quality of the printing, etc. Please provide an illustration of the front and rear side of these items.

[f] Please explain why the quality of the current PSS and PSC issues is comparable to the higher quality items as indicated by the higher unit prices. Please also indicate therefore why the quality of the current PSS and PSC issues is of a higher quality than the lower quality items as indicated by the lower unit prices. Please provide specific details including the type of paper, surface of the paper, thickness of the paper, quality of the printing, etc.

[g] Please confirm, or explain if you are unable to confirm, that the average unit retail price is subject to a large change if there is a change in the make-up of the sample items particularly since there is such as variability of prices, namely a 13.41 to one for stationery and 4.18 to one for postcards and since there is only a small sample size.

[h] Please specifically advise how the specific items were chosen for the samples.

DBP/USPS-37 Please refer to your response to Interrogatory OCA/USPS-T1-1.

[a] Please advise whether the dimensions shown for Stationery items 1 through 10 are the size of the card or the size of the envelope. If it is the dimension of the card, please advise the dimension of the envelope. If it is the dimension of the envelope, please confirm, or explain if you are unable to confirm, that the card is designed to fit into the envelope and is no more than one-half inch less in length and width than the envelope.

[b] Please advise the dimensions of the items shown in Stationery items 11 through 14 after they are folded for mailing.

[c] Please advise the postage that would be required to mail each of the nineteen items shown in the chart based on the size and characteristic of the mailpiece assuming that the weight is less than an ounce and the thickness is less than 0.25 inches. If the mailpiece is not mailable, so state.

DBP/USPS-38 Please refer to your response to Interrogatory OCA/USPS-T1-1.

Please explain why you believe that the lowest price for a postcard that is mailable at the post card postage rate is 83.1¢.

DBP/USPS-39 Please refer to your response to Interrogatory DBP/USPS-15.

Please specifically comment on the following characteristics of the latest Premium Stamped Cards as to their design with respect to mailability.

- [a] The proportion of the front of the card that is divided between the address part on the right side and the message part on the left side.
- [b] The effect that the vertical dividing line on the front of the card with respect to the reading of the Postnet barcode.
- [c] The surface of the front of the card with respect to the reading of the Postnet barcode and the cancellation.
- [d] The surface of the rear of the card with respect to the reading of the RBCS code.