

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-40-50]

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 9, 2007

Respectfully submitted,

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

DBP/USPS-40

[a] Please advise what consideration has been given to utilizing a Forever Stamp on any of the future Premium Stamped Stationery items.

[b] Please discuss the advantages and disadvantages that would occur by utilizing a Forever Stamp in lieu of a denominated stamp.

[c] Please confirm, or explain if you are unable to confirm, that once the price for a given PSS item has been determined utilizing the then current postage rates that its selling price will remain the same even if the postage rates change.

DBP/USPS-41

[a] Please advise what consideration has been given to utilizing a Forever Stamp on any of the future Premium Stamped Card items.

[b] Please discuss the advantages and disadvantages that would occur by utilizing a Forever Stamp in lieu of a denominated stamp.

[c] Please confirm, or explain if you are unable to confirm, that once the price for a given PSC item has been determined utilizing the then current postage rates that its selling price will remain the same even if the postage rates change.

[d] Please confirm, or explain if you are unable to confirm, that it would be necessary to change the DMCS to allow for a Forever Stamp at the card rate.

DBP/USPS-42 Please confirm, or explain if you are unable to confirm, that if the Postal Service were to change the lower limit of the range for selling PSC or PSS items that that this could still result in all of the PSC and PSS items being sold for the same prices as they would have been without the reduction in the lower limit.

DBP/USPS-43 Please refer to the chart that was provided in Interrogatory DBP/USPS-24 that was prepared using the data that was provided in response to Interrogatory DBP/USPS-1.

[a] Please explain why all of the Premium Stamped Cards that were sold in packages of 20 cards had a percent of the cost of a stamped card value that ranged from 48.75% to 123.75% while those that were sold in packages of less than 20 cards had a range of 168.75% to 298.33% with the exception of the Olympic Games PSC.

[b] Please provide the reasons for the Olympic Games PSC not falling in the range of all of the other similarly packaged PSC items.

DBP/USPS-44 For any of the PSC or PSS items that are still on sale, has a date been set for removing that item from sale. If so, please provide details.

DBP/USPS-45 Please provide details for any of the proposed PSC or PSS items due for sale during the remainder of 2007 including, if available, the same data that was provided in the response to Interrogatory DBP/USPS-1.

DBP/USPS-46 Please provide the production costs of all of the items that have been listed in response to Interrogatories DBP/USPS-1 and -2. If the information is not available, please provide estimates if available and explain why the information is not available or why an estimate had to be utilized rather than the actual data. Please provide copies of invoices/statements from the provider.

DBP/USPS-47 To the extent that it is available for any of the PSC or PSS items that have been issued, please provide quotations or other information which will indicate the costs for different print quantities.

DBP/USPS-48 Please compare the quantity of the PSC or PSS items printed on the invoices that are attached to the testimony in this docket as compared to the print quantity shown in response to Interrogatory DBP/USPS-1 and explain why there are differences. Please provide copies of any of the missing invoices or revise the quantity printed data.

DBP/USPS-49 Please confirm, or explain if you are unable to confirm, that if the PRC were to approve the pricing concept of providing a range based on the then current letter and card rates, that the cost coverage values would not be considered and that they would vary based on the actual production costs.

DBP/USPS-50 Please advise whether any consideration has been given to basing the selling price of PSC and PSS items on a range of multiples of the production costs

of the item rather than multiples of the then current letter and card rate. If not, why not?
If so, please discuss and provide both the advantages and disadvantages.