

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-51-68]

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 16, 2007

Respectfully submitted,

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

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DBP/USPS-51                      Please refer to your response to Interrogatory DBP/USPS-20. Please provide the reasons why certain items are on sale at local post offices but not at the SFS in Kansas City particularly since a significant number of items remain unsold.

DBP/USPS-52                      Please refer to your response to Interrogatory DBP/USPS-21. Since an average of 45-percent [and as much as 65-percent on one issue] of the

Premium Stamped Cards and an average of 59-percent of the Premium Stamped Stationery remain unsold at the end of March 2007, please explain how this affects the net profit and the cost coverage for these items.

Baseball Sluggers	30000	11472	18528	62%
DC Super Heroes	30000	19705	10295	34%
Disney Romance	30000	10593	19407	65%
Southern Florida Wetland	10000	8165	1835	18%
Disney Celebration	30000	21380	8620	29%
50s Sporty Cars	35000	16157	18843	54%
Let's Dance	30000	11126	18874	63%
Cloudscapes	45000	30984	14016	31%
Disney Friendship	68000	37434	30566	45%
Art of the American Indian	35000	22669	12331	35%
Garden Bouquet	30000	11364	18636	62%
Disney Friendship	40000	17246	22754	57%
	Number Printed	Total Sold as of 3/30/07	Number Unsold as of 3/30/07	Percent Unsold as of 3/30/07
All Card Items	343000	189685	153315	45%
All Stationery Items	70000	28610	41390	59%

DBP/USPS-53 Please refer to your response to Interrogatory DBP/USPS-21. Please explain why so many items are printed when for the items listed with a printing of 30,000 or more [all but one item] at least 29% or more of the items remain unsold after a period of as much as two and one-half years.

DBP/USPS-54 Please refer to your response to Interrogatory DBP/USPS-24. Please explain why the price of all of the stamped card size PSCs that have been issued since 2002 have been sold for more than twice the price of the three cards that were sold at the 48.75% rate.

DBP/USPS-55 Please refer to your response to Interrogatory DBP/USPS-25. Please confirm, or explain if you are unable to confirm, that if a rate as high as 3 times the stamped card rate is approved that it could be used for all PSC items regardless of whether they are similar to the current items or are a yet to be issued

higher quality or special edition version or even are of a lesser cost than the current items.

DBP/USPS-56                      Please refer to your response to Interrogatory DBP/USPS-30 subpart a. Please confirm, or explain if you are unable to confirm, that the Postal Service does not believe that the use would decline if the price was reduced.

DBP/USPS-57                      Please refer to your response to Interrogatory DBP/USPS-30 subpart b.

[a]     Please confirm, or explain if you are unable to confirm, that the PSC and PSS items are advertised in the SFS publication USA Philatelic.

[b]     Please confirm, or explain if you are unable to confirm, that the SFS publication USA Philatelic is designed as the official source for stamp enthusiasts.

[c]     Please advise the print and distribution quantities of a recent issue of USA Philatelic.

[d]     Please advise other methods, including quantities and extent, that the Postal Service uses to advertise the sale of PSC and/or PSS items.

[e]     Please confirm, or explain if you are unable to confirm, that the SFS publication USA Philatelic has contained in various issues all of the PSC and PSS items that have been issued.

[f]     Please discuss the extent to which the various methods of advertising provided in your response to subpart d of this interrogatory have advertised all of the PSC/PSS items or have been limited only to specific issues.

DBP/USPS-58                      Please refer to your response to Interrogatory DBP/USPS-32.

[a]     Does this response represent the personal belief of the witness or the full and complete answer of the United States Postal Service after making a reasonable inquiry of those individuals who might be able to provide a response to the Interrogatory?

[b] If it does not provide the full and complete answer of the United States Postal Service after making a reasonable inquiry of those individuals who might be able to provide a response to the Interrogatory, please provide same.

DBP/USPS-59 Please refer to your response to Interrogatory DBP/USPS-33.

[a] Does this response represent the personal belief of the witness or the full and complete answer of the United States Postal Service after making a reasonable inquiry of those individuals who might be able to provide a response to the Interrogatory?

[b] If it does not provide the full and complete answer of the United States Postal Service after making a reasonable inquiry of those individuals who might be able to provide a response to the Interrogatory, please provide same.

DBP/USPS-60 Please refer to your response to Interrogatory DBP/USPS-34.

[a] Does this response represent the personal belief of the witness or the full and complete answer of the United States Postal Service after making a reasonable inquiry of those individuals who might be able to provide a response to the Interrogatory?

[b] If it does not provide the full and complete answer of the United States Postal Service after making a reasonable inquiry of those individuals who might be able to provide a response to the Interrogatory, please provide same.

DBP/USPS-61 Please refer to your response to Interrogatory DBP/USPS-35.

Please advise the date that the Number Sold entry is as of.

DBP/USPS-62 Please refer to your response to Interrogatory DBP/USPS-35 subpart c.

Please confirm, or explain if you are unable to confirm, that the following calculations were utilized in obtaining the data:

[a] The Postage Revenue was determined by multiplying the Postage by the Items/Pack by the No. Packs Sold.

[b] The Total Revenue was determined by multiplying the No. Packs Sold by the Price per Pack.

[c] The Non-Postage Revenue was determined by subtracting the Postage Revenue from the Total Revenue.

DBP/USPS-63 Please refer to your response to Interrogatory DBP/USPS-35 subparts b and d.

[a] Does this response represent the personal belief of the witness or the full and complete answer of the United States Postal Service after making a reasonable inquiry of those individuals who might be able to provide a response to the Interrogatory?

[b] If it does not provide the full and complete answer of the United States Postal Service after making a reasonable inquiry of those individuals who might be able to provide a response to the Interrogatory, please provide same.

DBP/USPS-64 Please refer to your response to Interrogatory DBP/USPS-36 subparts g and h.

A response was not made to these subparts. Please provide.

DBP/USPS-65 Please refer to your response to Interrogatory DBP/USPS-36 subpart e, Please provide an illustration of the front and rear sides of Stationery items 11 through 14.

DBP/USPS-66 Please refer to your response to Interrogatory DBP/USPS-36 subparts e and f. Please provide a measurement of the thickness of the Stationery items 11 through 14 and of the two versions of the USPS PSS.

DBP/USPS-67 Please refer to your response to Interrogatory DBP/USPS-36. Please advise the statistical level of confidence that is associated with each of the two Average Unit Retail Price of Samples that appear in the charts.

DBP/USPS-68

Please refer to your response to Interrogatory DBP/USPS-

39.

[a] Does this response represent the personal belief of the witness or the full and complete answer of the United States Postal Service after making a reasonable inquiry of those individuals who might be able to provide a response to the Interrogatory?

[b] If it does not provide the full and complete answer of the United States Postal Service after making a reasonable inquiry of those individuals who might be able to provide a response to the Interrogatory, please provide same.