

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

PREMIUM FORWARDING SERVICE

DOCKET NO. MC2007-3

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-1 through 10]

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."

September 4, 2007

Respectfully submitted,

MC20073A1

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

DBP/USPS-1 For purposes of this Interrogatory, assume that I sign up at the Englewood NJ post office on February 1, 2007, for Premium Forwarding Service for ten weeks of forwarding the mail arriving at my Englewood NJ address starting on Wednesday, February 7, 2007, and ending on Wednesday, April 11, 2007, to an address in Boca Raton FL.

Further assume that on Friday, March 9, 2007, I find it necessary to move from my address in Boca Raton, FL to a new address in Tampa, FL.

[a] Please describe each of the methods [if any] that I may utilize to ensure that the March 14, 2007, mailing will be received at my address in Tampa, FL including any additional fees that will be required.

[b] Please describe each of the methods [if any] that I may utilize to ensure that the March 21 through April 11, 2007, mailings will be received at my address in Tampa, FL including any additional fees that will be required.

[c] Will I be permitted to file a Change of Address Order at the Boca Raton FL post office to have my Premium Forwarding Service mailings forwarded to my new address in Tampa, FL.? Please advise if there are any additional Premium Forwarding Service fees involved.

[d] If not, why not?

[e] Will I be permitted to file a Change of Address Order at the Boca Raton FL post office to have all of my mail that arrives directly [other than the Premium Forwarding Service mailings] at my Boca Raton, FL address forwarded to my new address in Tampa, FL?

[f] If not, why not?

[g] If I call the Englewood NJ post office on the telephone on Friday, March 9, 2007, and advise them of the move later that day from Boca Raton FL to Tampa FL and ask them to start forwarding my mail starting on Wednesday, March 14, 2007 to my new address in Tampa FL, what should I be advised by the Englewood NJ post office? Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.

[h] If I send a signed statement by facsimile to the Englewood NJ post office on Friday, March 9, 2007, and advise them of the move later that day from Boca Raton FL

to Tampa FL and ask them to start forwarding my mail starting on Wednesday, March 14, 2007 to my new address in Tampa FL, what action should the Englewood NJ post office take with respect to my signed facsimile request? Please provide two separate answers based on whether I do and do not provide them with a telephone number in my request. Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.

[i] If I send a signed letter to the Englewood NJ post office on Friday, March 9, 2007, which is received on Monday, March 12, 2007, and advise them of the move later that day from Boca Raton FL to Tampa FL and ask them to start forwarding my mail starting on Wednesday, March 14, 2007 to my new address in Tampa FL, what action should the Englewood NJ post office take with respect to my signed letter request? Please provide two separate answers based on whether I do and do not provide them with a telephone number in my request. Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.

[j] If I call the Boca Raton FL post office on the telephone on Friday, March 9, 2007, and advise them of the move later that day from Boca Raton FL to Tampa FL and ask them how I can have the address of my Premium Forwarding Service changed starting on Wednesday, March 14, 2007 to my new address in Tampa FL, what should I be advised by the Boca Raton FL post office? Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.

[k] If I call the Tampa FL post office on the telephone on Friday, March 9, 2007, and advise them of the move earlier that day from Boca Raton FL to Tampa FL and ask them how I can have the address of my Premium Forwarding Service changed starting on Wednesday, March 14, 2007 to my new address in Tampa FL, what should I be advised by the Tampa FL post office? Please explain the rationale for the response

given. Please advise if there are any additional Premium Forwarding Service fees involved.

[l] If I visit the Boca Raton FL post office in person on Friday, March 9, 2007, and advise them of the move later that day from Boca Raton FL to Tampa FL and ask them how I can have the address of my Premium Forwarding Service changed starting on Wednesday, March 14, 2007 to my new address in Tampa FL, what should I be advised by the Boca Raton FL post office? Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.

[m] If I visit the Tampa FL post office in person on Friday, March 9, 2007, and advise them of the move earlier that day from Boca Raton FL to Tampa FL and ask them how I can have the address of my Premium Forwarding Service changed starting on Wednesday, March 14, 2007 to my new address in Tampa FL, what should I be advised by the Tampa FL post office? Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.

[n] Please advise the level of satisfaction that you believe a PFS customer will have with the various responses received in the previous subparts of this Interrogatory,

DBP/USPS-2 For purposes of this Interrogatory, assume that I sign up at the Englewood NJ post office on February 1, 2007, for Premium Forwarding Service for ten weeks of forwarding the mail arriving at my Englewood NJ address starting on Wednesday, February 7, 2007, and ending on Wednesday, April 11, 2007, to an address in Boca Raton FL.

Further assume that on Friday, March 9, 2007, I find it necessary to return home making several stops enroute so that I arrive back in Englewood NJ on Thursday, March 15, 2007.

[a] Please describe each of the methods [if any] that I may utilize to ensure that the March 14, 2007, mailing will not be made including any additional fees that will be required or refunds available.

[b] Please describe each of the methods [if any] that I may utilize to ensure that the March 21 through April 11, 2007, mailings will not be made including any additional fees that will be required or refunds available.

[c] Will I be permitted to file a Change of Address Order at the Boca Raton FL post office to have my Premium Forwarding Service mailings forwarded to my permanent address in Englewood NJ? Please advise if there are any additional Premium Forwarding Service fees involved.

[d] If not, why not?

[e] Will I be permitted to file a Change of Address Order at the Boca Raton FL post office to have all of my mail that arrives directly [other than the Premium Forwarding Service mailings] at my Boca Raton, FL address forwarded to my permanent address in Englewood, NJ?

[f] If not, why not?

[g] If I call the Englewood NJ post office on the telephone on Friday, March 9, 2007, and advise them of the return to my permanent address in Englewood NJ and ask them not to make the March 14th mailing, what should I be advised by the Englewood NJ post office. Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees or refunds involved.

[h] If I send a signed statement by facsimile to the Englewood NJ post office on Friday, March 9, 2007, and advise them of the return to my permanent address in Englewood NJ and ask them to stop forwarding my mail starting on Wednesday, March

14, 2007, what action should the Englewood NJ post office take with respect to my signed facsimile request? Please provide two separate answers based on whether I do and do not provide them with a telephone number in my request. Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees or refunds involved.

[i] If I mail a signed statement to the Englewood NJ post office on Friday, March 9, 2007, which is received on Monday, March 12, 2007, and advise them of the return to my permanent address in Englewood NJ and ask them to stop forwarding my mail starting on Wednesday, March 14, 2007, what action should the Englewood NJ post office take with respect to my signed letter request? Please provide two separate answers based on whether I do and do not provide them with a telephone number in my request. Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees or refunds involved.

[j] If I call the Boca Raton FL post office on the telephone on Friday, March 9, 2007, and advise them of the return to my permanent address in Englewood NJ and ask them how I can stop my Premium Forwarding Service shipments starting on Wednesday, March 14, 2007, what should I be advised by the Boca Raton FL post office? Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees or refunds involved.

[k] If I visit the Boca Raton FL post office in person on Friday, March 9, 2007, and advise them of the return to my permanent address in Englewood NJ and ask them how I can stop my Premium Forwarding Service shipments starting on Wednesday, March 14, 2007, what should I be advised by the Boca Raton FL post office? Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees or refunds involved.

[l] Please advise the level of satisfaction that you believe a PFS customer will have with the various responses received in the previous subparts of this Interrogatory,

DBP/USPS-3 For purposes of this Interrogatory, assume that I sign up at the Englewood NJ post office on February 1, 2007, for Premium Forwarding Service for ten weeks of forwarding the mail arriving at my Englewood NJ address starting on Wednesday, February 7, 2007, and ending on Wednesday, April 11, 2007, to an address in Boca Raton FL.

Further assume that on Friday, April 13, 2007, I find that I will be remaining in Florida longer than I expected and I desire that two additional shipments be made on Wednesday, April 18 and 25, 2007.

[a] Please describe each of the methods [if any] that I may utilize to obtain the two additional shipments on Wednesday, April 18 and 25, 2007, including any additional fees that will be required.

[b] Will I be permitted to file a Change of Address Order at the Englewood NJ post office to have my mail received after the final scheduled PFS shipment on Wednesday, April 11, 2007, forwarded to my temporary Boca Raton FL address?

[c] If not, why not?

[d] If I call the Englewood NJ post office on the telephone on Friday, April 6 or 13, 2007, [the April 6th date was chosen as being before the last scheduled shipment date of April 11, 2007 while the April 13th date was chosen as being after the last scheduled shipment date but prior to the desired additional shipment dates - please provide separate answers if there is a different response] and advise them need for two additional weeks of PFS service, what should I be advised by the Englewood NJ post office? Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.

[e] If I send a signed statement by facsimile to the Englewood NJ post office on Friday, April 6 or 13, 2007, [the April 6th date was chosen as being before the last scheduled shipment date of April 11, 2007 while the April 13th date was chosen as being after the last scheduled shipment date but prior to the desired additional shipment dates - please provide separate answers if there is a different response] and advise them need for two additional weeks of PFS service, what action should the Englewood NJ post office take with respect to my signed facsimile request? Please provide two separate answers based on whether I do and do not provide them with a telephone number in my request. Please also provide separate responses if I include credit card data in my request. Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.

[f] If I send a signed letter to the Englewood NJ post office on Friday, April 6 or 13, 2007, [the April 6th date was chosen as being before the last scheduled shipment date of April 11, 2007 while the April 13th date was chosen as being after the last scheduled shipment date but prior to the desired additional shipment dates - please provide separate answers if there is a different response] and advise them need for two additional weeks of PFS service, what action should the Englewood NJ post office take with respect to my signed letter request? Please provide two separate answers based on whether I do and do not provide them with a telephone number in my request. Please also provide separate responses if I include credit card data or enclose a check for the required amount in my request. Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.

[g] If I call the Boca Raton FL post office on the telephone on Friday, April 6 or 13, 2007, [the April 6th date was chosen as being before the last scheduled shipment date of April 11, 2007 while the April 13th date was chosen as being after the last scheduled shipment date but prior to the desired additional shipment dates - please provide separate answers if there is a different response] and advise them need for two additional weeks of PFS service, what action should I be advised by the Boca Raton FL

post office? Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.

[h] If I visit the Boca Raton FL post office in person on Friday, April 6 or 13, 2007, [the April 6th date was chosen as being before the last scheduled shipment date of April 11, 2007 while the April 13th date was chosen as being after the last scheduled shipment date but prior to the desired additional shipment dates - please provide separate answers if there is a different response] and advise them need for two additional weeks of PFS service, what action should I be advised by the Boca Raton FL post office? Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.

[i] Please advise the level of satisfaction that you believe a PFS customer will have with the various responses received in the previous subparts of this Interrogatory,

DBP/USPS-4 [a] Please advise the various methods by which a customer may file a Change of Address Order.

[b] For each of the methods provided in response to subpart a, please provide the number of transactions in a recent year-long period that were conducted by that method.

[c] For each of the methods provided in response to subpart a, please advise whether the transaction must be completed in person at the post office from which the mail is being forwarded.

[d] For each of the methods provided in response to subpart a, please advise whether the transaction must be completed in person at any post office.

[e] For each of the methods provided in response to subpart a, please advise whether the transaction may be completed on line.

[f] For each of the methods provided in response to subpart a, please advise whether the transaction may be completed completely by mail.

[g] For each of the methods provided in response to subpart a, please provide a complete discussion of the methods that are utilized by the Postal Service to ensure the authenticity of the request.

[h] For each of the methods provided in response to subpart a, please provide the number of complaints that were received in that year about the submission of fraudulent requests.

DBP/USPS-5 [a] Please confirm, or explain if you are unable to confirm, that all transactions for Premium Forwarding Service must be conducted in person at the post office serving the primary local address of the customer. This includes the original request plus any need to modify or terminate an outstanding request.

[b] Please provide a complete discussion of the methods that are utilized by the Postal Service to ensure the authenticity of the PFS request.

[c] Please provide the number of complaints that were received in a recent year-long period about the submission of fraudulent PFS requests.

[d] For each of the methods by which a customer may file or modify a Change of Address Order but by which a Premium Forwarding Service request may not be conducted, please provide all of the reasons as to why Premium Forwarding Service may not be conducted by that means.

[e] Does the Postal Service believe that there is or may be a need for expanding the methods by which a customer may sign up for PFS or modify an existing order?

[f] If so, please explain why these needs are not being met in the current proposal.

[g] If not, why not?

DBP/USPS-6 [a] Please provide the results of the survey that was provided as Attachment 4 to USPS-T-1.

[b] Please advise how many surveys were distributed and how the recipients of the survey were chosen.

[c] Question 14 of this survey indicates the potential for signing up for PFS on the Internet. Why wasn't Internet signup made a part of the current request?

[d] Would Internet signup require an expenditure of additional funds? If so, quantify the amount and indicate the time period over which it would be expended.

DBP/USPS-7 [a] Question 22 of the PFS Application Form PS Form 8176 asks if a customer would prefer to enroll in the program using the Internet and by Telephone. Please advise the results of this survey question.

[b] Would Telephone signup require an expenditure of additional funds? If so, quantify the amount and indicate the time period over which it would be expended.

DBP/USPS-8 [a] Question 20 of the PFS Application Form PS Form 8176 requires the type of Government-issued Photo ID be recorded. Please explain why the number of the ID is not recorded.

[b] Please confirm, or explain if you are unable to confirm, that the presentation of a Government-issued Photo ID is not required for the submission of a Change of Address Order.

[c] Please confirm, or explain if you are unable to confirm, that the Change of Address request and the PFS request provide the same basic service, even though it obviously is under different conditions, namely, to forward a customer's mail to a new address.

[d] Please advise why the Postal Service believes that a greater level of security, namely, making the request in person at the local post office and presenting a Government-issued Photo ID card, is required for PFS but not for a Change of Address request.

DBP/USPS-9 [a] Please advise why the PFS enrollment must be completed at the post office serving the primary local address as opposed to being made at any post office.

[b] Please confirm, or explain if you are unable to confirm, that the PFS request may be made at any station or branch of the post office serving the primary local address.

[c] Please confirm, or explain if you are unable to confirm, that if a PFS request is made at station or branch that did not serve the PFS customer that the form would be forwarded to the branch or station that did.

[d] Please explain the difference between the employee at the Fort George Station of the New York NY post office [10040] forwarding the PFS application to the Village Station of the New York NY post office [10014] and between the employee at the Tenafly NJ post office [07670] forwarding the PFS application to the Englewood NJ post office [07631].

[e] Please confirm, or explain if you are unable to confirm, that if a customer had a Change of Address order requesting to forward the mail from Englewood NJ to Boca Raton FL and delivered that request to the Tenafly NJ post office, the Tenafly post office would forward the form to the Englewood post office.

[f] Why can't the same procedure take place with the PFS application?

DBP/USPS-10 Please confirm, or explain if you are unable to confirm, that it is the belief of the Inspection Service that if an individual wanted to submit a fraudulent request to change the address for someone's mail that they would be more likely to utilize a system that was free [filing a Change of Address Order] as opposed to one that required paying a fee [PFS].