

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

PREMIUM FORWARDING SERVICE

DOCKET NO. MC2007-3

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-22 through 23]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following follow-up 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."

October 4, 2007

Respectfully submitted,

MC20073C22

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

DBP/USPS-22

Please refer to your response to Interrogatory DBP/USPS-13

subparts a and b.

[a] Please confirm, or explain if you are unable to confirm, that if I filed a temporary Change of Address Order at the Boca Raton FL post office to forward my mail to an address in Tampa FL that the Boca Raton FL post office would have every reason to believe that mail destined for me could be properly delivered by forwarding it to Tampa FL.

[b] Please explain why the Boca Raton FL post office knowing full well that mail for me could be delivered by forwarding my mail to my address in Tampa FL would still return my PFS shipment to Englewood NJ.

[c] Please explain what the Englewood NJ post office would do with the PFS that was returned to them by the Boca Raton FL post office since I would be down in Tampa FL for a period of time [one that could be longer than the example that was originally proposed in Interrogatory DBP/USPS-1].

DBP/USPS-23 Please refer to your response to Interrogatory DBP/USPS-14.

[a] If the United States Postal Service believes that at his or her discretion, a Postal Service official may find it appropriate to complete such transactions by other means [other than an in-person visit at the post office that serves the customer's permanent address as called for by the existing and proposed regulations] in cases where there are extenuating circumstances and he or she can satisfactorily verify a customer's identity and collect the required timely payment (if any) that the PFS guidelines do not provide for such action.

[b] Please explain why it is appropriate to have very clear regulations and yet it is still acceptable for a Postal Service to use common sense and serve the customer by allowing for PFS actions to be taken by a means other than a personal visit to the post office serving a PFS customer's permanent address.