

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

STATION AND BRANCH OPTIMIZATION AND
CONSOLIDATION INITIATIVE, 2009

DOCKET NO. N2009-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-37 - 43]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to 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. 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 9, 2009

Respectfully submitted,

N20091F37

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

DBP/USPS-37 Please refer to your response to Interrogatory DBP/USPS-28. Please confirm, or explain if you are unable to confirm, that your current response supersedes the responses provided in Dockets R2000-1 and R2001-1 as they relate to the specific question.

DBP/USPS-38 Please refer to your response to Interrogatory DBP/USPS-28. Please confirm, or explain if you are unable to confirm, that for any foreseen circumstance and that absent any unforeseen circumstance, natural disaster, accident, etc. that all outgoing mail which a carrier collects while delivering mail along their route

or which an employee picks-up in response to a request for a pick-up will be processed and dispatched to the Processing Center on the same day, including Saturday, that it is collected or picked-up from the customer and will receive the same delivery standards for that day being Day 0. If necessary, make any distinctions based on the type of mail or type of carrier.

DBP/USPS-39 Please refer to your response to Interrogatory DBP/USPS-28. Please confirm, or explain if you are unable to confirm, that postal facilities that have delivery carriers operating out of them must have a scheduled direct or indirect trip to the Processing Center to allow for the mail collected along their route to receive same day dispatch upon their return to the facility.

DBP/USPS-40 Please refer to your response to Interrogatory DBP/USPS-28. Please confirm, or explain if you are unable to confirm, that the final collection time at the blue collection box located at the facility should be based on the final trip to the Processing Center including any trip which is utilized for dispatch of mail collected by delivery carriers along their route.

DBP/USPS-41 Please refer to your response to Interrogatory DBP/USPS-28. Please confirm, or explain if you are unable to confirm, that

1. Scans are made when scheduled collections are made at blue collection boxes and lobby drops.
2. These scans are evaluated and if a collection is missed or made early, an employee will be dispatched to that collection point.
3. Mail which is collected will then be brought to the Processing Center to receive the same dispatch it would have had it been properly collected.

If you cannot confirm the above procedure taking place at all facilities, please provide the best estimate of the extent to which it does take place.

DBP/USPS-42 Please refer to your response to Interrogatory DBP/USPS-28. If there are any facilities where mail collected by delivery carriers along their routes is not routinely dispatched for processing the same day, either weekday or Saturday,

[a] how are the customers made aware of this condition?

[b] If they are not made aware of this condition, why not?

If necessary, make any distinctions based on the type of mail or type of carrier.

DBP/USPS-43 Please refer to your response to Interrogatory DBP/USPS-29. Your response is not clear as to whether the origin Post Office will utilize the current time [the time that the carrier presents the mail to the acceptance clerk] or will, in effect, be backdated to the time the customer gave the mail to the carrier.

[a] Please clarify your response.

[b] What time and corresponding delivery standard is utilized on Express Mail collected from a blue Express Mail collection box? Please advise whether the origin Post Office will utilize the current time [the time that the carrier presents the mail to the acceptance clerk] or will, in effect, be backdated to the time shown on the blue collection box.