

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

STATION AND BRANCH OPTIMIZATION AND
CONSOLIDATION INITIATIVE, 2009

DOCKET NO. N2009-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS 46 - 47]

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 29, 2009

Respectfully submitted,

N20091H46

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

DBP/USPS-46

Please refer to your response to Interrogatory DBP/USPS-38.

[a] Please explain why you are unable to confirm the scenario posed in Interrogatory DBP/USPS-38 since I have posed it such that the unforeseen circumstances that you show in the response to Interrogatory DBP/USPS-28 as an exception to this arrangement have been removed from the Interrogatory. Furthermore in your response to Interrogatory DBP/USPS-39 you indicate that all postal facilities that have delivery carriers operating out of them will have the necessary transportation to achieve the

same day dispatch of mail collected by carriers along their routes and your response to Interrogatory DBP/USPS-42 indicates that such mail is routinely dispatched the same day.

[b] 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-47 Please refer to your response to Interrogatory DBP/USPS-43 subpart a.

Your response is still not clear. If a carrier picks up an Express Mail article at a customer's location at 11 AM and returns to the office at 3 PM at which time the article is turned over to the acceptance clerk, will the article have an acceptance time and corresponding service standard of 11 AM or 3 PM or some other time [if some other time, please explain why that time was utilized].