

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

SIX-DAY TO FIVE-DAY STREET DELIVERY  
AND RELATED SERVICE CHANGES

DOCKET NO. N2010-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL  
SERVICE [DBP/USPS-30 THROUGH 35]

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."

May 3, 2010

Respectfully submitted,

N20101D30

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

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DBP/USPS-30 [a] Please confirm, or explain if you are unable to confirm, that there are a number of post offices that have retail window service hours on a weekday that extend beyond the time by which it is possible to dispatch the mail to the processing plant that day. For example, an office that has Friday window service from 9 AM to 5 PM and the final trip to the processing plant which leaves before 5 PM.

[b] Please confirm, or explain if you are unable to confirm, that in the example noted in subpart [a], there will be a period of time on Friday where mail which is tendered over the retail window will not be dispatched to the processing plant until Saturday.

[c] Please confirm, or explain if you are unable to confirm, that if the proposed docket is approved, this mail [except for Express Mail] which is tendered over the retail window on Friday after the final dispatch will be dispatched to the processing plant so as to have a day 0 of Monday.

[d] Please advise the percentage of post offices countrywide that have a period of retail window service on Friday where the mail is dispatched to the processing center so as to have a day 0 of Saturday. If an exact percentage is not available, please provide the best estimate.

DBP/USPS-31 For purposes of this interrogatory assume the following scenario - a blue collection box located at a city delivery post office for which a 5 PM or later weekday collection time is mandated based on the location and/or mail volume at that box, however, for whatever reason, the final weekday collection time is posted and made at 4 PM. The box also has a Saturday collection.

[a] Please confirm, or explain if you are unable to confirm, that under the present conditions if a mailer deposits a letter in this collection box at 4:30 PM on a Friday and the letter is destined to an overnight area that letter will be delivered on Monday; if destined to a 2-day delivery area that letter will be delivered on Monday, and if destined to a 3-day delivery area that letter will be delivered on Tuesday.

[b] Please confirm, or explain if you are unable to confirm, that under the proposed conditions if a mailer deposits a letter in this collection box at 4:30 PM on a Friday and the letter is destined to an overnight area that letter will be delivered on Tuesday; if destined to a 2-day delivery area that letter will be delivered on Wednesday, and if destined to a 3-day delivery area that letter will be delivered on Thursday.

[c] Please confirm, or explain if you are unable to confirm, that if the Postal Service followed its own policies and collected this box at 5 PM and if a mailer deposits a letter in this collection box at 4:30 PM on a Friday and the letter is destined to an overnight area that letter will be delivered on Saturday; and if destined to a 2-day or 3-day delivery area that letter will be delivered on Monday.

DBP/USPS-32 Please refer to your response to Interrogatory DBP/USPS-8.

- [a] If mail is dispatched every evening, does this apply to all offices?
- [b] If not, please explain.
- [c] What is the earliest time a mail dispatch could take place at a given post office and still be considered as an evening dispatch?

DBP/USPS-33                      Please refer to your response to Interrogatory DBP/USPS-10.

For each of the 70-some odd postal districts in the country, please advise the percentage of the facilities that have retail window service on Saturday. Please provide a separate percentage considering main offices only and a second percentage for all facilities including stations and branches.

Please provide the data showing a separate response for each of the Districts.

DBP/USPS-34                      Please refer to your response to Interrogatory DBP/USPS-1.

[a] You indicated that some 479 locations do not provide weekend access to post office boxes. By weekend access, do you mean both Saturday and Sunday or either Saturday or Sunday?

[b] Please provide the reason[s] why these some 479 locations do not provide six-day a week mail delivery.

[c] Please confirm, or explain if you are unable to confirm, that all of the offices in the country except for these 479 locations will have incoming mail six days a week, will sort this mail and place it into the boxes, and customers will have access to their boxes and to pick-up mail that is not placed in the box.

DBP/USPS-35                      Please refer to your response to Interrogatory DBP/USPS-1.

You indicate that the challenges presented by non-letter shaped mail are a matter of ongoing development. Please advise the current status of this activity and when you expect the matter to be fully resolved.