

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-36 THROUGH 37]

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 4, 2010

Respectfully submitted,

N20101E36

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

DBP/USPS-36 [a] Please confirm, or explain if you are unable to confirm, that there will be transportation provided for Express Mail which enters the system on Saturday to bring this mail from the point of induction to a centralized location.

[b] What percentage of these trips will take place every Saturday [except for holidays] regardless of the volume of Express Mail inducted into the system on any given Saturday?

[c] What percentage of these trips will only be made if there are one or more Express Mail pieces inducted into the system on any given Saturday? In other words the transportation will be on an "on-call" basis.

[d] If the response to subpart [c] is greater than 0%, please explain how the system will work and how the service standards will be maintained.

[e] What percentage of these trips will be to the same centralized location that is presently utilized on a Saturday for all classes of mail?

[f] If the response to subpart [e] is greater than 0%, what percentage of those trips will transport mail other than Express Mail to the centralized location?

[g] If the response to subpart [f] is greater than 0%, please provide details on the types of other mail that will be transported and the percentage of that type of mail that will be transported presently on a Saturday.

DBP/USPS-37 Please refer to your response to Interrogatory DBP/USPS-22.

[a] Can Saturday consolidations take place across District boundaries?

[b] If not, why not?

[c] For each of the several hundred plants that are consolidated on a Saturday, please advise which facilities, in any, resulted in a change of First-Class Mail service standards taking into account that there is no delivery on Sunday. In other words are there any 3-digit ZIP Code locations that are changed from a two-day service standard to a three-day service standard by the act of consolidation? Likewise where a three-day area became a two-day area.

[d] What was the average savings in cost as the result of a Saturday consolidation?