

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-38 THROUGH 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."

May 7, 2010

Respectfully submitted,

N20101F38

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

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DBP/USPS-38                      Please refer to your response to Interrogatory DBP/USPS-7 subparts [b] and [c].

[a]     Please advise why the 8th word in your response is "could" rather than "would".

[b]     Under what conditions would a box holder not have to notify their correspondents?

[c]     To what extent does the Postal Service take into account the burden and cost placed on box holders whose address is changed by the Postal Service.

DBP/USPS-39                      Please refer to your response to Interrogatory DBP/USPS-9.

- [a] Please confirm that a holiday falling on a Saturday will be celebrated Friday.
- [b] Please confirm that this is a change in the current policy.
- [c] Please explain why this change was implemented.
- [d] Please refer to your response to subpart [b] in which you indicate that customers will be provided with notice of the reduced level of service. Please advise the methods of notification that will be provided.
- [e] For any blue collection boxes which will be collected prior to the existing posted time, will notice be placed on the box itself in a manner similar to the FedEx boxes located at a post office?
- [f] If not, why not?
- [g] Please refer to your response to subpart [c] with respect holidays celebrated in Puerto Rico. Are any of these holidays celebrated in the US Virgin Islands?
- [h] Please describe the notification that is provided to advise customers of the reduced level of service?
- [i] For any blue collection boxes which either will not be collected that day or will be collected prior to the existing posted time, will notice be placed on the box itself in a manner similar to the FedEx boxes located at a post office?
- [j] If not, why not?

DBP/USPS-40                      Please refer to your response to Interrogatory DBP/USPS-14.

- [a] Is it the intention that all Express Mail boxes that are accessible to the public will have a Saturday collection?
- [b] If not, why not? If so, by when will it be accomplished?

DBP/USPS-41                      Please refer to your response to Interrogatory DBP/USPS-15.

- [a] Is it the intention that all APCs will have a Saturday collection?
- [b] If not, why not? If so, by when will it be accomplished?

DBP/USPS-42                      Please refer to your response to Interrogatory DBP/USPS-17 subpart [c].

[a]     Please confirm, or explain if you are unable to confirm that the only way that post office box holders that are at ZIP Codes that are on the second list referred to in the response to subpart [a] of DBP/USPS-17 will be able to obtain Sunday or holiday delivery of their Express Mail will be if it is during hours of retail operation.

[b]     Please confirm, or explain if you are unable to confirm that all post offices that are at ZIP Codes that are on the second list referred to in the response to subpart [a] of DBP/USPS-17 have Sunday or holiday hours of retail operation to allow for the delivery of Express Mail on Sundays or holidays.

DBP/USPS-43                      Please refer to your response to Interrogatory DBP/USPS-28.

[a]     Under the proposed procedure if a First-Class Mail letter is mailed on a Friday before a Monday holiday in Englewood NJ 07631 to a street address in Paramus NJ 07652 it will have a delivery expectation of the following Tuesday - four calendar days later even though it would still be the next delivery day. How many days will that letter count towards reporting the days to delivery category? Please explain your answer

[b]     Please advise the data that is tabulated for the service performance of First-Class Mail and provide copies of the directives and manuals that support the collection and reporting of the data in the various reports.