

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-58 THROUGH 67]

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."

June 9, 2010

Respectfully submitted,

N20101J58

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

DBP/USPS-58 Please refer to your response to Interrogatory DBP/USPS-45 subparts [a] and [b].

[a] Were the Postal Service's responses to Interrogatory DFC/USPS-16 in this docket and Interrogatory DBP/USPS-46 in Docket N2009-1 designed to be a full and complete response to the question posed in the Interrogatory?

[b] If not, why not?

[c] Please explain why the response to Interrogatory DBP/USPS-46 in Docket N2009-1 did not include mention of excessive distance from the plant and transportation schedules.

DBP/USPS-59 Please refer to your response to Interrogatory DBP/USPS-45 subparts [e] through [g].

[a] Please confirm, or explain if you are unable to confirm, that the lack of any guidelines provides in effect a "blank check" for any local Postmaster to not comply with the need for same day dispatch of mail collected along their delivery routes.

[b] Please advise why there are no guidelines.

DBP/USPS-60 Please refer to your response to Interrogatory DBP/USPS-45 subpart [o].

Please provide a best estimate of the desired data.

DBP/USPS-61 Please refer to your response to Interrogatory DBP/USPS-47 subpart [c].

Please explain why if this clerical employee has all of these multiple functions, that one more function, namely collecting outgoing mail from the lobby drop and outside blue collection box, cannot be added to the list.

DBP/USPS-62 Please refer to your response to Interrogatory DBP/USPS-47 subpart [d].

[a] Please confirm, or explain if you are unable to confirm, that in general, if the volume of mail is generally too heavy for a delivery carrier to collect, there will be other employees on duty at the facility to make the collection.

[b] Please respond to the original subpart [d] if we assume there are no other employees on duty at the facility.

DBP/USPS-63 Please refer to your response to Interrogatory DBP/USPS-47 subpart [e].

[a] Please confirm, or explain if you are unable to confirm, that a scheduled collection time must be shown on the lobby drop [assuming the lobby is accessible to

the public] and blue collection box located outside the post office which is no more than one hour prior to the dispatch of the mail from that office.

[b] Please confirm, or explain if you are unable to confirm, that if a scanning of the collection drop is required that there is no reason why the collecting employee cannot be provided with the device/

DBP/USPS-64 Please refer to your response to Interrogatory DBP/USPS-52 subpart [d].

[a] Please confirm, or explain if you are unable to confirm, that all Express Mail, regardless of the method by which it is prepared and postage paid, may be deposited in the APC with the exception of articles weighing more than 13 ounces bearing only postage stamps as postage. The following articles/postage methods may be deposited in the APC:

1. Articles up to 13 ounces in weight regardless of the method of postage payment
2. Articles with one or more APC or postage meter "stamps" affixed
3. Articles prepared by Click 'N Ship
4. Articles paid by an Express Mail account

[b] Please advise any other acceptable methods of postage payment.

[c] Please confirm, or explain if you are unable to confirm, that all Express Mail, regardless of the method by which it is prepared and postage paid, may be deposited in an Express Mail collection box with the exception of articles weighing more than 13 ounces bearing only postage stamps as postage. The following articles/postage methods may be deposited in the collection box:

1. Articles up to 13 ounces in weight regardless of the method of postage payment
2. Articles with one or more APC or postage meter "stamps" affixed
3. Articles prepared by Click 'N Ship
4. Articles paid by an Express Mail account

[d] Please advise any other acceptable methods of postage payment.

DBP/USPS-65 Please refer to your response to Interrogatory DBP/USPS-53 subpart [b].

Please explain why blue collection boxes which will have a final collection made prior to the existing posted time will generally not have a notice placed on the box itself in a manner similar to the method utilized by FedEx.

DBP/USPS-66 Please refer to your response to Interrogatory DBP/USPS-53 subpart [c] and the original Interrogatory DBP/USPS-39 subpart [f].

If a blue collection box label has a final normal weekday collection time of 5 PM posted, please confirm, or explain if you are unable to confirm, that the second sentence of the response to subpart [f] of Interrogatory DBP/USPS-39 means that a collection will be made at that box at or shortly after 5 PM on all weekdays other than one of the ten holidays of the year.

DBP/USPS-67 Please refer to your response to Interrogatory DBP/USPS-55 and the original Interrogatory DBP/USPS-39 subparts [a] through [c].

[a] Please confirm, or explain if you are unable to confirm, that the policy with respect to the celebration of holidays that fall on a non-operating day will be celebrated on the nearest operating day.

[b] Please confirm, or explain if you are unable to confirm, that under the present scenario, a holiday falling on a Sunday would be celebrated on Monday and a holiday falling on a Saturday would be celebrated on Saturday [Friday would be a normal day].

[c] Please confirm, or explain if you are unable to confirm, that under the proposed scenario, a holiday falling on a Sunday would be celebrated on Monday and a holiday falling on a Saturday would be celebrated on Friday.

[d] Please confirm, or explain if you are unable to confirm, that under the present scenario, Saturday is considered an operating day.

[e] Please confirm, or explain if you are unable to confirm, that under the proposed scenario, Saturday would be considered a non-operating day.

[f] Please confirm, or explain if you are unable to confirm, that under the proposed scenario, a holiday falling on a Saturday would result in the loss of delivery to post office

boxes, processing of outgoing Express Mail, and retail window services for two days [Friday and Saturday].

[g] Please explain why for the purposes of holiday celebration, Saturday is being considered as a non-operating day when there are some services provided on Saturday.

[h] Please provide copies of regulatory citations that refer to the holiday celebration such as POM, DMM, etc.

[i] Please advise whether the holiday/Sunday delivery fee will apply for delivery of Express Mail on Friday and/or Saturday in the event of a holiday falling on Saturday. Please provide the rationale for your response.