

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE STANDARD CHANGES, 2012

DOCKET NO. N2012-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL  
SERVICE [DBP/USPS-32 through 33]

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. 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."

January 12, 2012

Respectfully submitted,

N20121E32

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

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DBP/USPS-32 [a] Should the Northern New Jersey Metro P&DC consolidate its operation to the DVD P&DC as proposed, will it now be necessary to bring my mail to the DVD P&DC rather than the NNJ Metro P&DC if I want to receive the SCF destination rate for mail that presently receives the SCF destination rate by bringing it to the NNJ Metro P&DC?

[b] Will any of the proposed consolidations throughout the country maintain their BMEU and/or destination drop off capability so as not to require additional travel?

[c] If so, why isn't this capability being utilized at the NNJ Metro P&DC?

DBP/USPS-33 Please confirm, or explain if you are unable to confirm, each of the following statements:

[a] There are a number of ZIP Code pairs that presently have overnight service standards for First-Class Mail.

[b] All of these ZIP Code pairs will convert to either 2-day or 3-day service standards for First-Class Mail.

[c] This conversion to 2-day and 3-day service standards represents a reduction in service.

[d] The price for First-Class Mail will remain the same before and after the conversion noted in subpart [b] above.

[e] A reduction in service while maintaining the same price represents a price increase.

[f] A similar price increase would also exist in First-Class Mail which is converted from a 2-day service standard to a 3-day service standard.

[g] Mailers who have a need to obtain the service standard that presently exists for First-Class Mail that is being converted to a slower service in the present Docket, will still be able to obtain the current delivery standard by sending their mail as Priority Mail or Express Mail.

[h] Priority Mail and Express Mail have a higher price than First-Class Mail.