

ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

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DOCKET NO. MC98-1

INTERROGATORIES OF DAVID B. POPKIN TO WITNESS PAUL G. SECKAR OF  
THE UNITED STATES POSTAL SERVICE

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. Particularly since the Postal Service is encouraging cooperation from the intervenors, I request that similar cooperation in liberally interpreting the requests made by my interrogatories and provide the desired information. To reduce the volume of paper, I have combined related requests into a single numbered interrogatory, however, I am requesting that a specific response be made to each separate question asked. To the extent that a reference is made in the responses to a Library Reference, I would appreciate receiving a copy of the reference since I am located at a distance from Washington, DC. All responses should be complete without reference to any previous Postal Rate Commission dockets. If necessary, these interrogatories should be redirected to the appropriate witness or responded to by the Postal Service.

July 27, 1998

Respectfully submitted,



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



DBP/USPS-T2-1 [a] Confirm that the costs during 1999 for a single sheet of 8-1/2 by 11 inch paper inserted in a plain #10 envelope will be 5.935 cents plus postage [1.45 cents for the impression, .49 cents for the paper, 2.72 cents for the envelope, 1.22 cents for the insertion, and .055 cents for transportation]. [b] Confirm that for printing on both sides of a single sheet of paper, the cost will be the same as in subpart

[a] plus 1.45 cents for the second impression. [c] Fully explain any negative responses. [d] Will these rates be utilized for the tests starting September 1, 1998? [e] If not, provide the rates that will be utilized.

DBP/USPS-T2-2 Witness John Hamm in his testimony [page 1 - lines 15-17] states that the greater the number of impressions, the lower the cost per impression. [a] Have your rates taken this into account? [b] If so, provide details and specifics. [c] If not, explain why not.

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

David B. Popkin

July 27, 1998

