

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

MAILING ONLINE SERVICE

DOCKET NO. MC98-1

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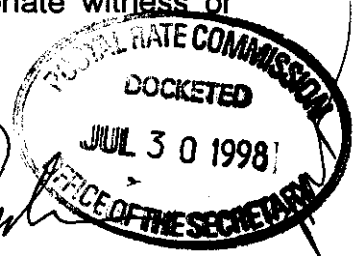
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

INTERROGATORIES OF DAVID B. POPKIN TO WITNESS FRANK E CAMPANELLI
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-T8-1 Since you are a customer utilizing this service, what compensation, direct or indirect, if any, has the Postal Service paid you for your testimony?

DBP/USPS-T8-2 On page 1 lines 7-9 of your testimony, you indicate that you sent out hundreds of thousands of direct mail pieces. [a] Over how long a period of time was that accomplished? [b] What was the nature of the mailing and is a similar

capability available with the proposed service? [c] What would you estimate the total costs for these hundreds of thousands of mail pieces? [d] What would you estimate the total costs would be under the existing initial program? [e] What would you estimate the total costs would be under the proposed rates in this Docket?

DBP/USPS-T8-3 On page 2 - lines 15 and 16 of your testimony, you indicate that you have never lost anything in the mail and that everything has reached its destination. [a] On what basis do you make this statement? [b] Have you contacted every recipient of every piece of mail that you have ever sent to determine that it was received? [c] Does this also include the hundreds of thousands of direct mail pieces? [d] If your response to subparts [b] or [c] is not an unqualified yes, explain how you can make the original statement.

DBP/USPS-T8-4 Why does it take you two hours to send out a mailing of 3,000 pieces while a mailing of 400 to 700 pieces only takes 20 minutes?

DBP/USPS-T8-5 [a] Did you pay extra to have the Postal Service "clean" your address lists? [b] If so, what was the charge?

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

