

ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

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MAILING ONLINE SERVICE

DOCKET NO. MC98-1

INTERROGATORIES OF DAVID B. POPKIN TO WITNESS MICHAEL K. PLUNKETT  
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

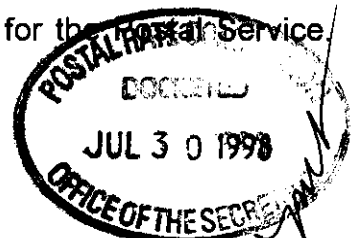
Respectfully submitted,



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

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DBP/USPS-T5-1 [a] Confirm that you are proposing to utilize different rates for this service depending on the printing costs for the contractor that will be utilized. [b] Confirm that there will be a 25% markup on whatever the contract calls for. [c] Confirm that the higher the contract value, the greater the markup for the Postal Service. [d] Explain any items that you are not able to confirm.



DBP/USPS-T5-2 [a] Are there any other instances in the many categories of mail that may be utilized where the rates are different for different parts of the country or different category of mailer for the same item mailed in the same manner? [b] If so, provide a complete listing. [c] Confirm that your explanation for the justification of this cost plus markup concept in the proposed Docket on page 3 of your testimony could also apply to all of those various postal rates which are the same throughout the country. [d] Fully explain if you are unable to confirm. [e] Why do you feel that this Docket, and this Docket alone, requires such a deviation from standard countrywide pricing?

DBP/USPS-T5-3 [a] Confirm that the higher the contract price, the greater the markup of 25% will be to the Postal Service. [b] If not, fully explain. [c] What incentive, does the Postal Service have to negotiate the lowest prices with the various printers?

DBP/USPS-T5-4 [a] Will it be possible to utilize Certified Mail and Return Receipt Service for mail sent in this program? [b] 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

