

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 JOHN HAMM 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.

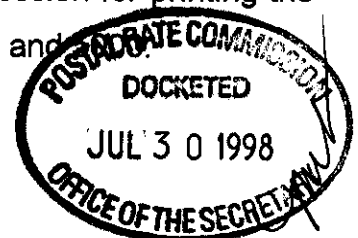
July 27, 1998

Respectfully submitted,



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

DBP/USPS-T6-1 On page 1 - lines 15-17 - of your testimony, you indicate that the greater number of impressions, the lower the cost per impression. For the service being proposed by the Postal Service, provide the cost per impression for printing the following number of impressions: 1, 10, 50, 100, 500, 1000, 3000, and



DBP/USPS-T6-2 On line 18 of Page 2 of your testimony you state that PIA members are eager to participate. [a] How many of the approximately 15,000 members were contacted to determine their response and desires? [b] How many members provided an unqualified eagerness to participate? [c] How many members provided a desire to participate with reservations? [d] How many members indicated that they were reluctant to participate?

DBP/USPS-T6-3 Since you are potentially a printing contractor for this service, what compensation, if any, has the Postal Service paid you for your testimony?

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

