ORIGINAL

## **BEFORE THE**

## POSTAL RATE COMMISSION

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WASHINGTON DC 20268-0001 JUL 3

Jul 30 12 os PM '98

MAILING ONLINE SERVICE

DOCKET NO. MC98-1

INTERROGATORIES OF DAVID B. POPKIN TO WITNESS BETH B. ROTHSCHILD
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 <a href="liberally">liberally</a> 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 <a href="each">each</a> 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-T4-1 You indicate that a number of focus groups discussed the proposal prior to the filing. Did the focus groups discuss any of the following [If yes but not adopted, what was the reason for not adopting the idea?]:

[a] The ability to have the mail enter the system on the same day as it is put on the website.

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- [b] The concept of regional pricing.
- [c] The ability to utilize post cards.
- [d] The ability to utilize a return address.
- [e] The ability to utilize the various address correction services.

## **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