

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
Submitted 3/31/2006 4:02 pm
Filing ID: 48185
Accepted 3/31/2006

EVOLUTIONARY NETWORK DEVELOPMENT]
SERVICE CHANGES, 2006]

DOCKET NO. N2006-1

INTERROGATORY OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-69]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatory pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. 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. Any reference to testimony should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-1-18 in Docket C2001-1, dated May 19, 2001, are incorporated herein by reference. In accordance with the provisions of Rule 25[b], I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

March 31, 2006
N20061L

Respectfully submitted,

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

DBP/USPS-69 Please refer to page 2 of the attachment to Witness Shah's Direct Testimony. [a] Under Overnight Delivery Standard for First-Class Mail it states that other areas may be considered for overnight delivery if significant business/mail volume relationships exist. Please explain how the Postal Service makes this determination and the types of studies that are conducted. [b] Please confirm, or explain if you are unable to do so, that the 3-hour dock-to-dock transit time referred to in the seventh paragraph of page 2 constitutes being within the reasonable reach of surface transportation as noted in the third paragraph of page 2. [c] Please refer to the seventh paragraph. Please explain how the

Postal Service makes the determination and the types of studies that are conducted to determine the operational and transportation feasibility for providing overnight service. [d] Please refer to the seventh paragraph. Please explain how the Postal Service makes the determination and the types of studies that are conducted to determine customer needs.

CERTIFICATE OF SERVICE

I hereby certify that I have this day 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 March 31, 2006
