

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate Commission  
Submitted 6/8/2006 11:21 am  
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Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE  
[DBP/USPS-86-87]

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. 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."

June 8, 2006

Respectfully submitted,

R20061J

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

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DBP/USPS-86 Please refer to your response to Interrogatory DBP/USPS-83 subpart c in Docket N2006-1. The Interrogatory was:

[c] Please discuss any efforts that have been made to, in effect, expand this listing and provide overnight service for Priority Mail to areas that are presently 2-day standard for First-Class Mail.

The response was:

[c] There has been no effort in this area in recent years.

The inside cover of a USPS booklet of "Ten 13 cent airmail stamps" stated the following:

THE TIME SAVER

In the larger cities you will find specially marked White-Top Airmail boxes. An Airmail letter in the White-Top box before the designated time listed on the box usually gets next-day delivery in major cities within 600 miles--and many beyond. And second day delivery anywhere else in the country. It makes sense to use the White-Top Box, a true Time Saver.

[a] Please confirm, or explain if you are unable to confirm, that the 13-cent Airmail rate was in effect from March 2, 1974 to December 30, 1975.

[b] Please confirm, or explain if you are unable to confirm, that Airmail was eliminated as a separate subclass of mail on May 1, 1977.

[c] Please confirm, or explain if you are unable to confirm, that when Airmail was eliminated as a separate subclass of mail on May 1, 1977, First-Class Mail was upgraded to Airmail service in those instances where it would expedite delivery over surface transportation.

[d] Approximately what year was the last discussion to upgrade the overnight delivery area for Priority Mail?

[e] What was the extent of the discussion that took place?

[f] Please explain why no discussion has taken place in recent years.

[g] Does the Postal Service believe that an expansion of the overnight delivery area would improve the level of service?

[h] If not, why not?

DBP/USPS-87 [a] Has there been any discussion to upgrade or downgrade the "line" between 2-day and 3-day service for Priority Mail?

[b] If so, please discuss.

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### 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 June 8, 2006

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