

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
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Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

INTERROGATORY OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-98]

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."

June 9, 2006

Respectfully submitted,

R20061M

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

DBP/USPS-98 [a] Please confirm, or explain if you are unable to confirm, that in order to determine the volume of a parcel as noted in Interrogatory DBP/USPS-97, it would be necessary to multiply the length times the width times the height of the parcel and that these dimensions could include fractions and that would require conversion of the fraction of an inch to a decimal and that it would either require a computer program, calculator, or a series of manual calculations.

[b] Please confirm, or explain if you are unable to confirm, that in order to determine the dimensional weight of a parcel as noted in Interrogatory DBP/USPS-97, it would be necessary to divide the volume by a 3-digit number and that it would either require a computer program, calculator, or a manual long division calculation.

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 9, 2006
