

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
Submitted 6/22/2006 3:55 pm
Filing ID: 49763
Accepted 6/22/2006

Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
WITNESS NINA YEH [DBP/USPS-T38-1-21]

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 22, 2006

Respectfully submitted,

R200610

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

DBP/USPS-T38-1 Please refer to your testimony at page 6, fn2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, please advise the changes that will be necessary to the DMCS for this proposed curtailment of service.

DBP/USPS-T38-2 Please refer to your testimony at page 6, fn2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, please advise the changes that will be necessary to the DMM for this proposed curtailment of service.

DBP/USPS-T38-3 Please refer to your testimony at page 6, fn2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will a customer

seeking to send a single piece of Bound Printed Matter be able to either pay part, all, or an excess amount of postage by means of a postage meter stamp or stamps and the rest, if any, by any other means, including, but not limited to regular postage stamps. If not, please explain the rationale behind your response.

DBP/USPS-T38-4 Please refer to your testimony at page 6, fn2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to either pay part, all, or an excess amount of postage by means of an Automated Postal Center [APC] stamp or stamps and the rest, if any, by any other means, including, but not limited to regular postage stamps. If not, please explain the rationale behind your response.

DBP/USPS-T38-5 Please refer to your testimony at page 6, fn2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to either pay part, all, or an excess amount of postage by means of a computer generated stamp or stamps such as those provided by stamps.com and the rest, if any, by any other means, including, but not limited to regular postage stamps. If not, please explain the rationale behind your response.

DBP/USPS-T38-6 Please refer to your testimony at page 6, fn2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to mail the article with a rural delivery letter carrier? If not, please explain the rationale behind your response.

DBP/USPS-T38-7 Please refer to your testimony at page 6, fn2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to mail the article with a city delivery letter carrier? If not, please explain the rationale behind your response.

DBP/USPS-T38-8 Please refer to your testimony at page 6, fn2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to mail the article with a highway contract delivery letter carrier? If not, please explain the rationale behind your response.

DBP/USPS-T38-9 Please refer to your testimony at page 6, fn2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will a customer seeking to send a single piece of Bound Printed Matter be able to mail the article with any of the ancillary services such as, but not limited to, Certificate of Mailing, Delivery Confirmation, Signature Confirmation, Insurance, COD? If so, please describe the method that would be utilized. If not, please explain the rationale behind your response.

DBP/USPS-T38-10 Please refer to your testimony at page 6, fn2. [a] Please advise why the Postal Service believes that it is necessary to simplify window service operations.

[b] Please describe how you believe this proposed regulation will achieve that objective.

DBP/USPS-T38-11 Please refer to your testimony at page 6, fn2. [a] Please advise why the Postal Service believes that it is necessary to reduce the complexity of retail transactions for customers.

[b] Please describe how you believe this proposed regulation will achieve that objective.

DBP/USPS-T38-12 Please refer to your testimony at page 6, fn2. Please enumerate and fully discuss any other reasons that exist for introducing this regulation other than those specified in interrogatories 10 and 11. If there are no other reasons, so state.

DBP/USPS-T38-13 Please refer to your testimony at page 6, fn2. Please describe the characteristics of a mailpiece that would be eligible for mailing as Media Mail but would not be eligible to mail as Bound Printed Matter.

DBP/USPS-T38-14 Please refer to your testimony at page 6, fn2. Please describe the characteristics of a mailpiece that would be eligible for mailing as Bound Printed Matter but would not be eligible to mail as Media Mail.

DBP/USPS-T38-15 Please refer to your testimony at page 6, fn2. Please describe the characteristics of a mailpiece that would be eligible for mailing as Bound Printed Matter but would not be eligible to mail as either Express Mail, Priority Mail, First-Class Mail, or Parcel Post.

DBP/USPS-T38-16 Please refer to your testimony at page 6, fn2. Please describe why you believe a retail customer can not make an easily distinguishable choice to use Bound Printed Matter [if the contents of the mailpiece are authorized] over Media Mail or Parcel Post.

DBP/USPS-T38-17 Please refer to your testimony at page 6, fn2. Please confirm that the delivery service standards for Bound Printed Matter are the same as for Parcel Post and/or Media Mail. If not, please explain.

DBP/USPS-T38-18 Please refer to your testimony at page 6, fn2. Please discuss why you believe that this reduction in service will not be a change in the nature of postal services which will generally affect service on a nationwide or substantially nationwide basis.

DBP/USPS-T38-19 Please refer to your testimony at page 6, fn2. Please confirm, or explain if you are unable to confirm, that the postage rates for single piece Bound Printed Matter will in all cases be less than that for Parcel Post.

DBP/USPS-T38-20 Please refer to your testimony at page 6, fn2. Please confirm, or explain if you are unable to confirm, that the postage rates for single piece Bound Printed Matter will either be more or less than that for Media Mail depending on the zone.

DBP/USPS-T38-21 Please advise the Rate Schedule and Page Number of Attachment A of the R2006-1 Request showing the current and proposed rates for Bound Printed Matter, Media Mail, and Library Mail.

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 22, 2006
