

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID POPKIN  
(DBP/USPS-600-629, AND 633-639)  
(September 20, 2006)

The United States Postal Service hereby provides its institutional responses to the following interrogatories of David Popkin: DBP/USPS-600 through 629, and 633 through 639, filed on September 5, 2006. Each interrogatory is stated verbatim and is followed by the response. Objections to DBP/USPS-599 and 630-632 were filed on September 15, 2006.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Chief Counsel, Ratemaking

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-600** Please refer to your response to Interrogatory DBP/USPS-528. Your response does not appear to respond to my original Interrogatory DBP/USPS-289 subpart a, which inquired as to whether the results of the PTS would be affected if a collection or pick-up was not made as scheduled. This was clarified in DBP/USPS-528 and not responded to.

**RESPONSE:**

An article will be entered into PTS when it is scanned for the first time. In the example that you gave, the first scan is on Tuesday after 5:00 p.m. The last scan likely will be on Thursday morning or afternoon. The time measurement will be calculated accordingly, and would not include time before the first scan.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-601** Please refer to your response to Interrogatory DBP/USPS-530. I realize that the carrier will provide a scan when the piece is delivered. What I am referring to is when it appears that all mailpieces requiring a scan are scanned "in bulk" with an arrival at unit scan or other in transit scan as the mailpieces are being processed prior to being given to the delivery carrier for ultimate delivery to the addressee.

**RESPONSE:**

The Delivery Confirmation Service process does not slow up the delivery of the mail piece.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-602** Please refer to your response to Interrogatory DBP/USPS-498. Please confirm, or explain if you are unable to confirm, that the mailpiece described in the original Interrogatory would likely be processed in such a manner that it would be processed in an automated system such that any individual letter will not be observed by human eyes specifically observing that individual letter until the delivery carrier was approaching the delivery point.

**RESPONSE**

Not confirmed. Human visual examination of postage on individual pieces of domestic collection mail is most likely to occur either at the delivery unit or on the delivery route.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-603** Please refer to your response to Interrogatory DBP/USPS-506. Please confirm, or explain if you are unable to confirm, that absent any mailer input, the clerk would only affix 9¢ in postage.

**RESPONSE**

Confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-604** Please refer to your response to Interrogatory DBP/USPS-510 subparts b through e. Please explain why you believe that the wording of the proposed DMCS changes preclude the use of the Forever Stamp to pay the postage for the first ounce of a First-Class Mail Single Piece letter that weighed over one ounce and up to 3.5 ounces [the maximum weight for a letter].

**RESPONSE**

The DMCS language reflects the intended purpose of the stamp. Re-read the response to subpart (c) of DBP/USPS-510.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-605** Please refer to your response to Interrogatory DBP/USPS-510 subparts b through e. Your response stated, "The Postal Service is considering giving postage credit for such uses at the original purchase price, but a final determination has not yet been made."

[a] Please advise what criteria will be considered in making this determination.

[b] What is the current status of this determination?

[c] When will the final determination become disclosed to the participants in this Docket?

**RESPONSE**

(a) Revenue protection, administrative burden, and ease of use are among the factors likely to come into play.

(b) Ongoing.

(c) The statement refers to value of the stamp beyond the R2006-1 rate cycle. The Postal Service intends to study any policy questions related to the value of the 42-cent Forever Stamp beyond the R2006-1 rate cycle before it files its next (post R2006-1) rate request. Whether the Postal Service will be able to completely resolve all such post- R2006-1 issues before the conclusion of the litigation of Docket No. R2006-1 remains to be seen.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-606** Please refer to your response to Interrogatory DBP/USPS-510 subparts b through e. Please confirm, or explain if you are unable to confirm, that under the Postal Service's current position on the Forever Stamp as of August 28, 2006, the date of filing the response to Interrogatory DBP/USPS-510 is that the only use that a mailer may make of the Forever Stamp is to fully pay the postage on a First-Class Mail Single Piece letter weighing one ounce or less which is destined to places where the United States Postal Service operates and which does not have any of the nonmachinable characteristics [which would require payment at the rate for a flat].

**RESPONSE**

Not confirmed. Your interrogatory is premised upon the mistaken notion that the intended pupose of the Forever Stamp is the only use that will be tolerated. Again, re-read the response to subpart (c) of DBP/USPS-510.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-607** Please refer to your response to Interrogatory DBP/USPS-510 subparts b through e. Please confirm, or explain if you are unable to confirm, that under the Postal Service's current position on the Forever Stamp as of August 28, 2006, the date of filing the response to Interrogatory DBP/USPS-510 is that if a mailer has utilized a Forever Stamp to fully pay the postage on a First-Class Mail Single Piece letter weighing one ounce or less which is destined to places where the United States Postal Service operates and which does not have any of the nonmachinable characteristics [which would require payment at the rate for a flat], the mailer may utilize ancillary services [such as, Certified Mail or Registered Mail] for that one ounce letter provided the postage for the ancillary service was paid for with a means other than one or more Forever Stamps.

**RESPONSE**

Confirmed that that is one option. See the response to DBP/USPS-606.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-608** Please refer to your response to Interrogatory DBP/USPS-510 subparts b through e. Please confirm, or explain if you are unable to confirm, that under the Postal Service's current position on the Forever Stamp as of August 28, 2006, the date of filing the response to Interrogatory DBP/USPS-510 is if a mailer affixes a Forever Stamp to a post card that the stamp will have no postage value since it was not being utilized on a First-Class Mail Single Piece letter weighing one ounce or less which is destined to places where the United States Postal Service operates and which does not have any of the nonmachinable characteristics. Furthermore, the mailpiece will be treated in the same manner as if it did not have any postage affixed or was shortpaid if there was any other non-Forever Stamp postage affixed which did not cover the full postage requirement. In addition, the Forever Stamp may receive a cancellation marking due to the processing of the mailpiece which would preclude its further use.

**RESPONSE**

Not confirmed. See the response to DBP/USPS-606.

Confirmed that the stamp would likely be cancelled and, thus, precluded from further use.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-609** Please refer to your response to Interrogatory DBP/USPS-510 subparts b through e. Please confirm, or explain if you are unable to confirm, that under the Postal Service's current position on the Forever Stamp as of August 28, 2006, the date of filing the response to Interrogatory DBP/USPS-510 is if a mailer affixes a Forever Stamp to a First-Class Mail Single Piece letter weighing over one ounce that the stamp will have no postage value since it was not being utilized on a First-Class Mail Single Piece letter weighing one ounce or less which is destined to places where the United States Postal Service operates and which does not have any of the nonmachinable characteristics. Furthermore, the mailpiece will be treated in the same manner as if it did not have any postage affixed or was shortpaid if there was any other non-Forever Stamp postage affixed which did not cover the full postage requirement. In addition, the Forever Stamp may receive a cancellation marking due to the processing of the mailpiece which would preclude its further use.

**RESPONSE**

Not confirmed. See the responses to DBP/USPS-606.

See also the response to DBP/USPS-608.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-610** Please refer to your response to Interrogatory DBP/USPS-510 subparts b through e. Please confirm, or explain if you are unable to confirm, that under the Postal Service's current position on the Forever Stamp as of August 28, 2006, the date of filing the response to Interrogatory DBP/USPS-510 is if a mailer affixes a Forever Stamp to a First-Class Mail Single Piece letter which has one or more of the nonmachinable characteristics that the stamp will have no postage value since it was not being utilized on a First-Class Mail Single Piece letter weighing one ounce or less which is destined to places where the United States Postal Service operates and which does not have any of the nonmachinable characteristics. Furthermore, the mailpiece will be treated in the same manner as if it did not have any postage affixed or was shortpaid if there was any other non-Forever Stamp postage affixed which did not cover the full postage requirement. In addition, the Forever Stamp may receive a cancellation marking due to the processing of the mailpiece which would preclude its further use.

**RESPONSE**

Not confirmed. See the response to DBP/USPS-606. See also the response to DBP/USPS-608.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-611** Please refer to your response to Interrogatory DBP/USPS-510 subparts b through e. Please confirm, or explain if you are unable to confirm, that under the Postal Service's current position on the Forever Stamp as of August 28, 2006, the date of filing the response to Interrogatory DBP/USPS-510 is if a mailer affixes a Forever Stamp to a First-Class Mail Single Piece flat that the stamp will have no postage value since it was not being utilized on a First-Class Mail Single Piece letter weighing one ounce or less which is destined to places where the United States Postal Service operates and which does not have any of the nonmachinable characteristics. Furthermore, the mailpiece will be treated in the same manner as if it did not have any postage affixed or was shortpaid if there was any other non-Forever Stamp postage affixed which did not cover the full postage requirement. In addition, the Forever Stamp may receive a cancellation marking due to the processing of the mailpiece which would preclude its further use.

**RESPONSE**

Not confirmed. See the response to DBP/USPS-606.

See also the response to DBP/USPS-608.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-612** Please refer to your response to Interrogatory DBP/USPS-510 subparts b through e. Please confirm, or explain if you are unable to confirm, that under the Postal Service's current position on the Forever Stamp as of August 28, 2006, the date of filing the response to Interrogatory DBP/USPS-510 is if a mailer affixes a Forever Stamp to a First-Class Mail Single Piece parcel that the stamp will have no postage value since it was not being utilized on a First-Class Mail Single Piece letter weighing one ounce or less which is destined to places where the United States Postal Service operates and which does not have any of the nonmachinable characteristics. Furthermore, the mailpiece will be treated in the same manner as if it did not have any postage affixed or was shortpaid if there was any other non-Forever Stamp postage affixed which did not cover the full postage requirement. In addition, the Forever Stamp may receive a cancellation marking due to the processing of the mailpiece which would preclude its further use.

**RESPONSE**

Not confirmed. See the response to DBP/USPS-606.

See also the response to DBP/USPS-608.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-613** Please refer to your response to Interrogatory DBP/USPS-510 subparts b through e. Please confirm, or explain if you are unable to confirm, that under the Postal Service's current position on the Forever Stamp as of August 28, 2006, the date of filing the response to Interrogatory DBP/USPS-510 is if a mailer affixes a Forever Stamp to mailpiece including a one ounce letter destined to an international destination that the stamp will have no postage value since it was not being utilized on a First-Class Mail Single Piece letter weighing one ounce or less which is destined to places where the United States Postal Service operates and which does not have any of the nonmachinable characteristics. Furthermore, the mailpiece will be treated in the same manner as if it did not have any postage affixed or was shortpaid if there was any other non-Forever Stamp postage affixed which did not cover the full postage requirement. In addition, the Forever Stamp may receive a cancellation marking due to the processing of the mailpiece which would preclude its further use.

**RESPONSE**

Not confirmed. Using this stamp for an International mail piece is not an intended use of the forever stamp. However, please see the response to interrogatory DBP/USPS-606. See also the response to DBP/USPS-608.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-614** Please refer to your response to Interrogatory DBP/USPS-510 subparts b through e. Please confirm, or explain if you are unable to confirm, that under the Postal Service's current position on the Forever Stamp as of August 28, 2006, the date of filing the response to Interrogatory DBP/USPS-510 is if a mailer affixes a Forever Stamp to a mailpiece other than a First-Class Mail Single Piece letter [such as, a parcel being sent by one of the package services] that the stamp will have no postage value since it was not being utilized on a First-Class Mail Single Piece letter weighing one ounce or less which is destined to places where the United States Postal Service operates and which does not have any of the nonmachinable characteristics. Furthermore, the mailpiece will be treated in the same manner as if it did not have any postage affixed or was shortpaid if there was any other non-Forever Stamp postage affixed which did not cover the full postage requirement. In addition, the Forever Stamp may receive a cancellation marking due to the processing of the mailpiece which would preclude its further use.

**RESPONSE**

Not confirmed. See the response to DBP/USPS-606. See also the response to DBP/USPS-608.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-615** Please refer to your response to Interrogatory DBP/USPS-510 subparts b through e. Please confirm, or explain if you are unable to confirm, that under the Postal Service's current position on the Forever Stamp as of August 28, 2006, the date of filing the response to Interrogatory DBP/USPS-510 is if a mailer affixes a Forever Stamp to mailpiece including a one ounce letter for which either Priority Mail or Express Mail service is desired that the stamp will have no postage value since it was not being utilized on a First-Class Mail Single Piece letter weighing one ounce or less which is destined to places where the United States Postal Service operates and which does not have any of the nonmachinable characteristics. Furthermore, the mailpiece will be treated in the same manner as if it did not have any postage affixed or was shortpaid if there was any other non-Forever Stamp postage affixed which did not cover the full postage requirement. In addition, the Forever Stamp may receive a cancellation marking due to the processing of the mailpiece which would preclude its further use.

**RESPONSE**

Not confirmed. See the response to DBP/USPS-606. See also the response to DBP/USPS-608.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-616** Please refer to your response to Interrogatory DBP/USPS-510 subparts b through e. Since the Postal Service has indicated what their interpretation of the proposed DMCS wording is, please confirm, or explain if you are unable to confirm, that if the Postal Service were to arrive at a conclusion that it would give postage credit for other unintended purposes for the Forever Stamp, it would require changing the wording of the DMCS.

**RESPONSE**

While the purpose of the Forever Stamp is to facilitate the mailing of one-ounce First-Class Mail letters, mailers will not be penalized for using it as postage for other mail pieces in the R2006-1 rate cycle. Accordingly, there would be no need to change the proposed DMCS language intended to apply during that period. In any event, implementing language regarding postage credit for unintended purposes could be published elsewhere.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-617** Please refer to your response to Interrogatory DBP/USPS-510 subparts b through e. Please explain how observation of the use of the Forever Stamp during the period starting at the imposition of the 42¢ First-Class Mail letter rate [assuming that it is approved] and ending at the time that the next increase is filed for [since I assume that any changes or updating of the Forever Stamp would have to be filed contemporaneously with the request for an increase in the First-Class Mail letter rate] would provide any useful information to evaluate and determine the policy for unintended postage uses.

**RESPONSE**

Experience and observation produce information and wisdom and a more firm basis for long-term policy.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-618** Please refer to your response to Interrogatory DBP/USPS-510 subparts b through e. Please confirm, or explain if you are unable to confirm, that under the Postal Service's current position on the Forever Stamp as of August 28, 2006, the date of filing the response to Interrogatory DBP/USPS-510, if that ultimately becomes the implemented policy as a result of this Docket and then sometime after that implementation, probably on the order of several years later, that there would be confusion caused by the change in Forever Stamp policies.

**RESPONSE**

Your question is premised upon a misunderstanding of current policy and appears to be the only source of confusion on this issue.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

- DBP/USPS-619** Please refer to your response to Interrogatory DBP/USPS-510 subpart c.
- [a] Please confirm, or explain if you are unable to confirm, that the first sentence of the proposed DMCS Section 241 states what postage may be paid by the Forever Stamp.
  - [b] Please confirm, or explain if you are unable to confirm, that the last sentence of the proposed DMCS Section 241 states what use may be made of the Forever Stamp.
  - [c] Please explain how you believe that even though the proposed DMCS states what use may be made of the Forever Stamp any other use can also be made of them so long as the DMCS does not specifically prohibit that use.
  - [d] Does that same method of interpreting other Postal Service policies and regulations apply in a similar manner, namely, if the regulation states what can be done, anything else is also permitted unless it specifically also prohibits that use or activity.
  - [e] If not, why not?

**RESPONSE**

- (a) The sentence addresses the intended purpose of the stamp.
- (b) The sentence addresses the intended purpose of the stamp.
- (c) Again, the intended use is not the only use that will be permitted in the R2006-1 rate cycle.
- (d) The Postal Service administers many thousands and of policies, regulations and guidelines reflected in numerous manuals, handbooks and instructions. The Postal Service has no intention of undertaking the exercise of reviewing all of this material for the purpose of determining the degree to which each provision conforms to a particular interpretive convention.
- (e) Because it is not necessary to do so in order to be responsive to issues relevant to the Forever Stamp proposal in this docket.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-620** Please refer to your response to Interrogatory DBP/USPS-510 subparts b through e. Please confirm, or explain if you are unable to confirm, that if the proposed DMCS wording is adopted as proposed, the Postal Service could adopt the ultimate DMM regulations that prohibited any unintended postage use regardless of any informal agreements or Interrogatory responses.

**RESPONSE**

Not confirmed. To do so would be contrary to the Postal Service's stated intentions for the Docket No. R2006-1 rate cycle. Therefore, such interpretive language could not be adopted.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-621** Please refer to your response to Interrogatory DBP/USPS-516.

- [a] Please confirm, or explain if you are unable to confirm, that all of the non-denominated un-lettered transition stamps were ultimately issued in the same design but with a numerical denomination shown.
- [b] Please respond to the original Interrogatory if one assumes that the Postal Service could have utilized a letter on the transition stamp in place of the number that ultimately appeared on the final denominated version of the same design.

**RESPONSE**

- (a) That indeed may have occurred.
- (b) DBP/USPS-516 refers back to DBP/USPS-358. It is impossible to understand what is now being asked, or which question is being referred to as the “original Interrogatory.”

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-622** Please refer to your responses to Interrogatories DBP/USPS-547 subpart g, DBP/USPS-548 subpart k, and DBP/USPS-549 subpart i.

- [a] Please confirm, or explain if you are unable to confirm, that the Postal Service is not intending to develop a policy for unintended postage use and applications for the Forever Stamp prior to the completion of the litigation on Docket R2006-1.
- [b] Please confirm, or explain if you are unable to confirm, that the Postal Service is expecting the Commission to approve the Forever Stamp under the Postal Service's current position on the Forever Stamp as of August 28, 2006, the date of filing the response to Interrogatory DBP/USPS-510 is that the only use that a mailer may make of the Forever Stamp is to fully pay the postage on a First-Class Mail Single Piece letter weighing one ounce or less which is destined to places where the United States Postal Service operates and which does not have any of the nonmachinable characteristics [which would require payment at the rate for a flat].
- [c] Please explain why the Postal Service submitted this proposal to the Commission without being fully explored and evaluated.

**RESPONSE**

- (a) Not confirmed. That policy for purposes of the R2006-1 rate cycle is already clear.
- (b) Not confirmed.
- (c) In the minds of some, no rate or classification proposal is ever “fully” explored and/or evaluated. Nevertheless, in 35 years, the Postal Service, the rest of the intervenors and the Commission have repeatedly managed to develop evidentiary records sufficient to provide a basis for sound-decision-making by focusing on the issues that are relevant to the *material* aspects of mail classification and rate proposals under review. In this regard, the Forever Stamp proposal is not exceptional.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-623** Please refer to your responses to Interrogatories DBP/USPS-546 and DBP/USPS-552. Please prepare and submit a revised and corrected Library Reference.

**RESPONSE**

The Library References are not incorrect. The imperfections of their production have been documented in such way as to permit readers to locate and focus on relevant materials.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-624** Please refer to your response to Interrogatory DBP/USPS-537.

[a] Please advise the date of the current version of Notice 3-A.

[b] Please provide the specific wording that appears on the Notice 3-A that serves to provide additional guidelines to postal acceptance clerks as opposed to reformatting the DMM regulations to place them in a more convenient format.

**RESPONSE**

The 1997 template provides guidance that goes beyond the mere convenient reformatting of Domestic Mail Manual text. It serves as a measuring device that can be applied to test the machinability of actual mail pieces.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-625** Please refer to your response to Interrogatory DBP/USPS-540.

I am still attempting to determine the rationale for assessing the mailer of a standard 6- by 9-inch kraft envelope with a metal clasp with the nonmachinable surcharge if the mailpiece weighs less than one ounce. For purposes of this response assume that there are no other characteristics of the mailpiece which would trigger the surcharge. Assume that it is a plain envelope with two sheets of 8-1/2 by 11-inch paper neatly folded in half and inserted in the envelope, the envelope does not have a plastic bag enclosure, and has the address parallel to the longer dimension of the envelope. Is the rationale for the application of the surcharge based on:

- [a] the unevenness of the mailpiece caused by the thickness of the physical clasp? The metal clasp does have a thickness that makes that part of the envelope slightly thicker than the rest of the envelope.
- [b] the ability of the clasp to catch on something else during processing?
- [c] the rigidity of the mailpiece caused by the metal clasp? The metal clasp is metal and conceivably could pose a problem by making the mailpiece too rigid.
- [d] If there is any other specific physical condition for the application of the surcharge, please specify.

**RESPONSE**

Please refer to the response to DBP/USPS-540(b).

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-626** Please refer to your response to Interrogatory DBP/USPS-541 subpart f. Please explain why you are unable to confirm that a direct measurement made by holding a ruler up against the dimension being measured will not be more accurate than an indirect measurement made by sighting along the mailpiece and ruler [including the fact that the dimension being evaluated is 0.25 and 0.75 inches only [See DBP/USPS-542] and compressibility [See DBP/USPS-543]]

**RESPONSE**

The answer to DBP/USPS-541 speaks for itself. No clarification or explanation is necessary.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-627** Please refer to your response to Interrogatory DBP/USPS-542 subpart b. Please advise how a retail window clerk will be able to utilize Notice 3-A to determine the 0.75 inch dimension.

**RESPONSE**

The Notice 3A is one of two measuring tools mentioned in the response to subpart (b). That response never implied that the 3A was the tool for use in determining whether thickness exceeded 0.75 inches.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-628** Please refer to your response to Interrogatory DBP/USPS-542 subpart c. Please advise how a mailer will be able to utilize the DMM to determine the thickness of a mailpiece.

**RESPONSE**

The response to subpart (c) refers to two tools that could be used to measure thickness.

That response never implied that the DMM could be used to determine thickness, only that it could be used to determine the rate consequences of particular degrees of thickness.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-629** Please refer to your response to Interrogatory DBP/USPS-544.

- [a] Please advise the types of "available tools" that will be available to virtually all, if not all, of the retail window clerks to allow them to measure the mailpiece.
- [b] If these tools will not be available to all retail window clerks, please explain.

**RESPONSE**

(a-b) The available measuring tools are referenced in the responses. There is no basis for assuming a change in their availability in the test year.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-632** Please refer to your response to Interrogatory DBP/USPS-559. Please advise the system that will be implemented to implement the dim-weight program as far as what types of parcels will require what types of entries and how those numbers were arrived at.

**RESPONSE:**

The requested information is not available at this time.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-633.** Please refer to your response to Interrogatory DBP/USPS-471 revised on August 30, 2006. Please advise why no record and internal accounting is made for charging insured parcels to the delivering employees in a similar manner as done on PS Form 3867 with other types of accountable mail.

**RESPONSE:**

The Postal Service believes that the current procedures with regard to Insurance fulfill its needs. Moreover, adding any more steps to the process would increase costs associated with the product, possibly leading to higher fees for the consumer. The Postal Service, however, has not studied these costs.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-634** Please refer to your response to Interrogatory DBP/USPS-562. Please respond to the original Interrogatory with the obviously typographical errors corrected as follows:

Please refer to your response to Interrogatory DBP/USPS-454.

[a] Please define the words "logistically feasible" as used in your response.

[b] Please advise the specific conditions that would make the scenario described in subpart a of Interrogatory DBP/USPS-454 not "logistically feasible."

**RESPONSE**

[a] The term references the possibility that some presently unknown barrier to a bifurcated implementation may surface so as to make it not workable from the point of view of the Postal Service and/or the Board of Governors and/or the Governors.

(b) It cannot be known what specific conditions might make a scenario infeasible until those specific conditions arise and available information at that time leads to a determination regarding feasibility. The possibility of such a scenario cannot be excluded. The likelihood of such a prospect cannot be predicted.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-635** Please refer to your response to Interrogatory DBP/USPS-562.

- [a] In the past, have the Board of Governors ever implemented an Opinion and Recommended Decision in a staggered manner?
- [b] If so, please provide details.
- [c] If so, please respond to the original subpart c of Interrogatory DBP/USPS-562.

**RESPONSE**

- (a) Yes.
- (b) Selection of specific implementation dates is a matter beyond the province of the Postal Rate Commission and the ratemaking process. Without waiving its right to object to this and other questions, the Postal Service invites your attention to the April 8, 2002 Decision of the Governors in Docket No. R2001-1, as it pertains to electronic Return Receipt service, which may be accessed via the Archive function on the PRC website.
- (c) The Postal Service responded fully to the original subpart (c) of DBP/USPS-562.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-636** Please refer to your response to Interrogatory DBP/USPS-567. Please confirm, or explain if you are unable to confirm, that in general when postage stamps are issued, they are issued for a specific value and will always have that value even though they may require additional postage to accomplish the same function. For example, during the period from June 30, 2002, to January 7, 2006, the Postal Service sold a 37¢ stamp which would serve the purpose of a one-ounce Single Piece First-Class Mail letter and from January 8, 2006, on if one wanted to use a 37¢ stamp on a similar mailpiece, it would be necessary to affix an additional 2¢ in postage.

**RESPONSE**

Confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-637** Please refer to your response to Interrogatory DBP/USPS-418.

- [a] Your response did not refer to the status of letters that weigh between one ounce and 3.5 ounces. For example, will a 1.6 ounce mailpiece that meets the definition of a letter but has a one or more characteristics that would subject it today to a 13¢ nonmachinable surcharge [if such a surcharge were to be applicable to over one ounce letters] pay the rate under the proposed regulations for a 2-ounce letter of 62¢ or a 2-ounce flat of 82¢? Examples of such a mailpiece would be a birthday card measuring 6-by 6-inches or a 6- by 9-inch envelope sealed with a metal clasp [the weight would be 1.6 ounces and the thickness would be less than 0.25 inches in either case].
- [b] If the requirement to use the postage rates for flats on letters that have one or more nonmachinable characteristics applies to letters weighing one ounce or less, please confirm, or explain if you are unable to confirm, that the postage for both a one ounce and a two ounce letter with one or more nonmachinable characteristics will be the same.

**RESPONSE**

- [a] The mail piece described in your question would pay the 2 ounce rate for a flat-shaped piece which is proposed to be 82 cents.
- [b] The basic postage for the piece described in your question will be the proposed rate for flat-shaped pieces of 62 cents. The two ounce piece will have additional ounce proposed postage of 20 cents. Confirmed that 42 plus 20 equals 62.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-638** Please refer to your response to Interrogatory DFC/USPS-T48-22. Please advise the date that the six page paper that was attached to the response was prepared.

**RESPONSE**

February 2006.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-639** Please refer to the attachment to your response to Interrogatory DFC/USPS-T48-22. This attachment raises a number of questions and presents a number of statements on how the Forever Stamp will be considered and implemented. Have all of these questions and statements been incorporated into the proposal as presented in Testimony T-48 and the subsequent discovery that has been conducted or must each of these questions and statements be litigated based on this attachment?

**RESPONSE**

No and no.