

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

EXPERIMENTAL PREMIUM
FORWARDING SERVICE

Docket No. MC2005-1

DAVID B. POPKIN
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-T3-8]

January 25, 2005

I hereby submit interrogatories to the United States Postal Service. The instructions contained in the interrogatories DFC/USPS-1-18 filed May 21, 2001, in Docket C2001-1, are incorporated herein by reference.

Respectfully submitted,

January 25, 2005

David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

MC20051M

DBP/USPS-T3-8 Please refer to your response to Interrogatory OCA/USPS-T3-18. [a] Please explain why you measured the time to the nearest one-hundredth of a second. [b] Did it seem odd to you that ten separate measurements had values that were all within 1.015 seconds of 119.135 seconds? [c] If not, why not? [d] Please advise the arrangements that were made with the individual offices to observe these measurements including how you were able to conduct measurements at two separate offices on the same day since one might believe that repacking would be done at a similar time of the day. [e] Were the six individuals who were doing the repacking aware that they were being observed? [f] If so, please explain if that is the normal procedure and why you feel the data is reliable. [g] If not, what is the title of any other person in each facility who was aware that the observations were being made? [h] What is the approximate travel time between the two Minnesota offices, the two Connecticut offices, and the two Virginia offices?

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

January 25, 2005

David B. Popkin