

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
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EVOLUTIONARY NETWORK DEVELOPMENT]
SERVICE CHANGES, 2006]

DOCKET NO. N2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-1 through 15]

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."

February 20, 2006

Respectfully submitted,

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

DBP/USPS-1 Please advise whether all of the responses to interrogatories that have been made in the pending Complaint case C2001-3, Complaint of First-Class Mail Service Standards are still valid. If not, please provide an updated response.

DBP/USPS-2 Please confirm, or explain if you are unable to confirm, that Library Reference USPS-LR-N2006-1/2 is identical in all respects to the CD-ROM that is provided by the Postal Service's Memphis office.

DBP/USPS-3 Please provide a listing of all the changes that have been made in the service standards prior to those that appear in Library Reference USPS-LR-N2006-1/2. This response should be provided for each of the previous CD-ROMs or other listings of service standards and should go back to the last time the Commission issued a recommended decision for delivery standards.

DBP/USPS-4 Please provide a listing of those service standards changes that the Postal Service is proposing to implement on or about May 15, 2006 as a result of this Docket.

DBP/USPS-5 Please provide a listing of the redactions that have been made to Library References. Please provide the Library Reference number, page number, and a description of the type of data that was redacted from that page.

DBP/USPS-6 Please refer to the page 2 of the attachment to Witness Shah's testimony as it relates to First-Class Mail. [a] Please provide a listing of the single SCF or 3-digit ZIP Code destinations that have a transit time of three hours or less dock-to-dock from the NNJ Metro P&DC in Teterboro NJ. [b] Please provide a listing of the single SCF or 3-digit ZIP Code destinations that receive 1.5% or more of the originating volume of the NNJ Metro P&DC in Teterboro NJ. [c] Please provide copies of the studies that have been made of the business/mail volume relationships to those single SCF or 3-digit ZIP Code destinations that are listed in the response to both subparts a and b above with respect to mail from the NNJ Metro P&DC in Teterboro NJ. [d] If there is a single SCF or 3-digit ZIP Code destinations that did not have a study made, please explain why. [e] For those single SCF or 3-digit ZIP Code destinations that are in your response to subparts a and b and which currently receive 2-day service standards, please explain why they do not receive overnight delivery service standards.

DBP/USPS-7 Please refer to the page 2 of the attachment to Witness Shah's testimony as it relates to First-Class Mail. Please provide a listing of those ZIP Code pairs that currently do not have overnight or 2-day delivery service standards and are located within the same state [i.e. where there are ZIP Code pairs within the same state that currently have 3-day delivery standards].

DBP/USPS-8 Please refer to the page 3 of the attachment to Witness Shah's testimony as it relates to Priority Mail. Please explain why it was necessary to include the word "usually" in the last sentence and provide a listing of those ZIP Code pairs where the Priority Mail are slower than those for First-Class Mail.

DBP/USPS-9 Please refer to the page 3 of the attachment to Witness Shah's testimony as it relates to Priority Mail. [a] Please provide the number of ZIP Code pairs and the percentage of Priority Mail volume where the service standards of Priority Mail and First-Class Mail are both overnight. [b] Please provide the number of ZIP Code pairs and the percentage of Priority Mail volume where the service standards of Priority Mail and First-Class Mail are both second day. [c] Please provide the number of ZIP Code pairs and the percentage of Priority Mail volume where the service standards of Priority Mail and First-Class Mail are both third day. [d] Please provide the number of ZIP Code pairs and the percentage of Priority Mail volume where the service standards of Priority Mail is second day and First-Class Mail is third day. [e] Please provide the number of ZIP Code pairs and the percentage of Priority Mail volume where the service standards of Priority Mail is overnight and First-Class Mail is either second or third day. Please provide a listing of the specific ZIP Code pairs involved in the response to subpart e.

DBP/USPS-10 Please refer to the page 3 of the attachment to Witness Shah's testimony as it relates to periodicals. Please advise the ZIP Code pairs where periodicals have a faster delivery standard than First-Class Mail.

DBP/USPS-11 Please refer to the page 3 of the attachment to Witness Shah's testimony as it relates to Standard Mail and periodicals. [a] Do these standards apply to only the 48 contiguous states as Packages Services standards do or do they apply to all 50 states and offshore destinations. [b] If they only apply to the 48 contiguous states, please provide the standards for Alaska, Hawaii, and the offshore destinations. [c] Please explain how Standard Mail and Periodicals are processed when originating and/or destinating in Alaska, Hawaii, and offshore destinations to achieve the claimed standards. [d] Please explain why similar processing is not provided for Package Services to or from Alaska, Hawaii, and offshore destinations.

DBP/USPS-12 Please refer to the page 4 of the attachment to Witness Shah's testimony as it relates to Package Services. Please provide an indication of the standards that are experienced for these destinations.

DBP/USPS-13 Please refer to the attachment to Witness Shah's testimony. Please confirm, or explain if you are unable to confirm, that the reference to days on the chart on page 1 and to the Number of Days column on pages 2, 3, and 4 refers to calendar days and not delivery days [unless the service standard day is a non-delivery day in which case the delivery would be made on the next delivery day - except for Express Mail]

DBP/USPS-14 Please provide a listing of all mail processing facilities including the following information as a minimum: [1] Type of facility [2] Name of the facility [3] City and state in which it is located [4] ZIP Code range of the mail that is processed at the facility.

DBP/USPS-15 Please refer to the page 4 line 11 of Witness Shah's testimony as it relates to class-based processing networks. [a] Please advise those instances where mail of different classes is processed together. [b] Please advise the effects that the combination of mail classes has an effect on the delivery standards of the higher class of mail. [c] Please advise the details of any plans to increase the instances where mail of different classes in processed together.

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 February 15, 2006
