

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

INTERROGATORY OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-58]

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."

March 14, 2006
N22061G

Respectfully submitted,

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

DBP/USPS-58

Assume the following scenario:

1. Plant A has a given level of ZIP Code areas that are overnight, 2-day, and 3-day for First-Class Mail originated within its ZIP Code area.
2. Plant B has an identical listing of overnight, 2-day, and 3 day ZIP Code areas.
3. Plant A is closed and mail from its associated offices is sent to Plant B for processing.

[a] Please confirm, or explain if you are unable to do so, that it may be necessary for associate offices that were previously served by Plant A and are now served by Plant B to make an earlier dispatch of their mail. [b] Please provide a listing of those scenarios that

could result in requiring the earlier dispatch as noted in subpart a. [c] Please confirm, or explain if you are unable to do so, that if an associate office in the area formerly served by Plant A was required to make an earlier dispatch as a result of the consolidation, it could result in earlier collection times at one or more blue collection boxes at that office or earlier cutoffs for mail deposited in the lobby drop or over the retail window. [d] Please provide any other possible changes that might be required in addition to those listed in subpart c. [e] Please confirm, or explain if you are unable to do so, that if, for example, it became necessary to change the final collection time at a blue collection box at the associate office previously served by Plant A from 6 PM to 5 PM that this would result in a reduction of the level of service provided to the customers of that office even though the ZIP Code areas of the overnight, 2-day, and 3-day First-Class Mail were still the same. [f] Please confirm, or explain if you are unable to do so, that other classes of mail could be equally effected as First-Class 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 March 14, 2006
