

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-71-73]

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."

April 10, 2006
N20061N

Respectfully submitted,

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

DBP/USPS-71 Please refer to the response to Interrogatory DBP/USPS-42. [a] Please confirm, or explain if you are unable to do so, that with the exception of the advancing of the collection times of the 161 of 738 collection boxes in the Olympia WA area as noted in your response, there were no changes in the final collection times of the blue collection boxes or lobby drops at any of the associate offices or at the plants in the other ten consolidations as noted in Library References N2006-1/5 and /6. [b] Please explain why it was necessary to advance the collection times of the 161 boxes in the Olympia WA area including what changes, if any, were made in the times of the final dispatch to the plant at the affected offices

[independent or subsidiary offices that had one or more of the 161 boxes under their jurisdiction].

DBP/USPS-72 Please refer to your response to Interrogatory DBP/USPS-44. [a] Is it still current USPS Policy to require a slot in every post office to allow mailers to deposit mail that will receive a local postmark? [b] If not, what is the current policy and provide information on changes to that policy that have occurred. [c] What is the current USPS Policy with respect to having a separate blue collection boxes for the deposit of local mail including the locations where such boxes may be required? [d] Will mail deposited in the local collection boxes referred to in subpart c above receive a local postmark? [e] What changes have been made to this policy? [f] Please confirm, or explain if you are unable to do so, that when mailers present mail at a local retail window they may request and receive local postmarking for that mail. [g] Please provide copies of the current POM/DMM or other references that contain the current policy for each of the above.

DBP/USPS-73 Please refer to your response to Interrogatory DBP/USPS-57. [a] Have there been any changes to the listings provided in Library Reference C2001-3/3 in the data provided for the 11 offices that have clearance time changes from the national standards or in the 17 outlier facilities? [b] If so, please provide the details and updated listings. [c] Have there been any changes in the mail processing in California as it relates to the establishment of "pseudo" ADCs? [d] If so, please provide the details. [e] Please confirm, or explain if you are unable to do so, that with the exception of the ZIP Code origin-destination pairs that are affected by the clearance time changes and outlier facilities described in Library Reference C-2001-3/3 [responses to Interrogatories DBP/USPS-33 and 37], the "pseudo" ADC activity in California, and any pair that might be erroneously entered into the data base, that all other ZIP Code origin-destination pairs are in compliance with the national standards. [f] Please advise the approximate percentage of ZIP Code origin-destination pairs that are in compliance with the national service standards. Please provide separate responses for overnight, 2-day, and 3-day standards as well as a combined response.

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 April 10, 2006
