

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-82-88]

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."

May 12, 2006

Respectfully submitted,

N20061R

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

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DBP/USPS-82                      Please refer to the listing provided in response to Interrogatory DBP/USPS-80. Bridgeport CT 066 is has overnight First-Class Mail to SCF Westchester NY while the other ZIP Code prefixes that are processed in the same Southern Connecticut P&DC, 063 064 and 065, do not have similar overnight service. Is this an error? If not, please explain why the 066 mail is segregated from the rest of the mail.

DBP/USPS-83                      Please refer to the response to Interrogatory DBP/USPS-81. [a] Please explain why these 18 ZIP Code pairs process their Priority Mail in a manner to achieve overnight service while First-Class Mail is 2-day service. It is noted that one-third of the 18 are

in the Caribbean area and another one-third are Portland ME to 047. [b] Please explain why the First-Class Mail service from Portland ME to Bangor ME 047 is 2-day standard while service to the rest of the Bangor ME SCF, 044, 046, and 049, is overnight. [c] Please discuss any efforts that have been made to, in effect, expand this listing and provide overnight service for Priority Mail to areas that are presently 2-day standard for First-Class Mail. [d] If no efforts have been made, please explain why not.

DBP/USPS-84                      Please refer to USPS Library Reference N2006-1/11. Pages 23, 24, 53, 54, and 66 indicate that there were changes in the service standards as a result of the consolidation. Please explain and discuss how the needs of the customer were taken into account in making these changes.

DBP/USPS-85                      Please refer to your response to Interrogatory DBP/USPS-71. [a] What does DOV stand for? [b] For each of the specific independent or subsidiary offices that had one or more of the 161 boxes under their jurisdiction changed from a final collection time of 5 PM to 4 PM, please provide a listing of the before consolidation and after consolidation times of the final dispatch to the plant from each of the involved offices.

DBP/USPS-86                      Please refer to your response to DBP/USPS-72. Please provide the specific section of the Postal Operations Manual that refers to the response to each of my subparts.

DBP/USPS-87                      Please refer to your response to DBP/USPS-6. Please provide your best estimate of the percentage of processing facilities that do not provide overnight First-Class Mail service standards to all of the SCF or 3-digit ZIP Code destinations that have a transit time of three hours or less dock-to-dock and receive 1.5% or more of the originating volume of the facility.

DBP/USPS-88                      If your response to Interrogatory DBP/USPS-87 is anything less than the value implied by the last sentence of the response to Interrogatory DBP/USPS-73 subparts e and f as it relates to the non-compliance of the guidelines to determine the "line" between 2-day and 3-day service, please discuss why the "line" between overnight and 2-day service is not complied with to the same extent and any plans to achieve better compliance in the future.

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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     May 12, 2006

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