

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
Submitted 6/27/2006 3:52 pm
Filing ID: 49902
Accepted 6/27/2006

Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-110-114]

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."

June 27, 2006

Respectfully submitted,

R20061R

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

DBP/USPS-110 [a] Please refer to your response to Interrogatory DBP/USPS-85. Please confirm, or explain if you are unable to confirm, that you are considering the services that are provided by droppers, reporters, and return address panel members in both the EXFC and PETE programs to be professional services.

[b] Please define the term professional services as used in the original response.

DBP/USPS-111 [a] Please refer to your response to Interrogatory DBP/USPS-85. Please advise if any or all of the droppers, and/or reporters, and/or return address panel members are employees of the EXFC/PETE Contractor.

[b] If so, are they paid compensation at or above the minimum wage?

DBP/USPS-112 [a] Please refer to your response to Interrogatory DBP/USPS-85. Please advise if any or all of the droppers, and/or reporters, and/or return address panel members are independent contractors of the EXFC/PETE Contractor.

[b] If so, are they paid compensation at or above the minimum wage?

DBP/USPS-113 [a] Please refer to your response to Interrogatory DBP/USPS-85. Please advise if any or all of the droppers, and/or reporters, and/or return address panel members are volunteers of the EXFC/PETE Contractor.

[b] If so, are they paid a cash compensation at or above the minimum wage?

[c] If so, are they paid a cash compensation less than the minimum wage?

[d] If so, are they paid a token non-cash compensation?

[e] If so, are they not provided any compensation?

DBP/USPS-114 With respect to the 4-state Customer Barcode.

[a] Please provide copies of any publications that relate to them.

[b] Please advise the types of mail that have 4-state barcodes affixed to them.

[c] Please describe the process of affixing 4-state barcodes to mailpieces.

[d] Please describe the data fields that are contained in a 4-state barcode.

[e] Please advise how a 4-state barcode may be manually decoded.

[f] Please advise how the use of 4-state barcodes will expedite the processing of mail.

[g] Please discuss and quantify any savings or added costs that result from the use of 4-state barcodes.

[h] What affect will the implementation of the 4-state barcodes have on the use of Postnet barcodes and/or the "orange" RBCS markings?

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 June 27, 2006
