

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate Commission  
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Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE  
[DBP/USPS-203-215]

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."

July 6, 2006

Respectfully submitted,

R20061X203

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

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DBP/USPS-203                      Please refer to your response to Interrogatory DBP/USPS-26 subpart b.                      Please advise the number and percentage of Express Mail articles that are guaranteed for 5-day delivery.

DBP/USPS-204                      Please refer to your response to Interrogatory DBP/USPS-26 subparts a and e. In response to subpart a you indicated that the FY 2005 Express Mail volume was 55,474,717 pieces and in the response to subpart e you indicated that in FY 05 95.4% of the Express Mail pieces or 51,185,801 pieces were delivered on time. 95.4% of 55,474,717 pieces is 52,922,880 pieces. Please explain the difference and provide corrected

data for Express Mail total number of articles, total revenue received, percent delivered on time, number of pieces delivered on time for FY 2004 and 2005..

DBP/USPS-205            Please refer to your response to Interrogatory DBP/USPS-26. Please confirm, or explain if you are unable to confirm, that for either the total universe of Express Mail articles or for any specific subset, the average price per article may be obtained by dividing the revenue by the number of pieces.

DBP/USPS-206            Please refer to your response to Interrogatory DBP/USPS-26. Please confirm, or explain if you are unable to confirm, that there is no reason to believe that the average price per Express Mail article would be the same for those articles that are delivered on time as compared to those that are not delivered on time.

DBP/USPS-207            Please refer to your response to Interrogatory DBP/USPS-26. Please confirm, or explain if you are unable to confirm, that there is no reason to believe that the average price per Express Mail article would be the same for those articles that are not delivered on time and for which a claim for postage refund was filed as compared to those that for which a claim for postage refund was not filed.

DBP/USPS-208            Please refer to your response to Interrogatory DBP/USPS-26 subpart f. Please provide the dollar value of Express Mail refunds that were made in FY 2004 and FY 2005.

DBP/USPS-209            Please refer to your response to Interrogatory DBP/USPS-4. If we are to assume that a mailpiece weighs over one ounce and less than 13 ounces, is large enough to be mailable, it does not exceed the maximum size, it is properly prepared and addressed, and that it does not contain any prohibited material, then please confirm, or explain if you are unable to confirm, that under the present regulations in order to determine the proper First-Class Mail postage the mailer need only determine the weight of the mailpiece and does not need to determine the shape or any other characteristics of the mailpiece.

DBP/USPS-210            Please refer to your response to Interrogatory DBP/USPS-4. If we are to assume that a mailpiece weighs over one ounce and less than 13 ounces, is large enough to be mailable, it does not exceed the maximum size, it is properly prepared and

addressed, and that it does not contain any prohibited material, then please confirm, or explain if you are unable to confirm, that under the proposed regulations in order to determine the proper First-Class Mail postage the mailer must determine the weight of the mailpiece and must also determine the shape and other characteristics of the mailpiece.

DBP/USPS-211                    Please confirm, or explain if you are unable to confirm, that:

[a]     Under the present regulations there are a number of characteristics that will cause a one ounce single-piece First-Class Mail article to pay an additional 13¢ postage for the nonmachinable surcharge.

[b]     Under the present regulations, the nonmachinable surcharge is only assessed on mailpieces that weigh one ounce or less.

[c]     Single-piece First-Class Mail articles must weigh less than 3.5 ounces to be eligible under the proposed regulations to be mailable at the letter rates.

[d]     Under the proposed regulations any single-piece article which otherwise qualifies for mailing at the letter rates but has any of the nonmachinable characteristics noted in subpart a will be required to pay an additional 20¢ in postage regardless of its weight.

DBP/USPS-212                    Please refer to your response to Interrogatory DBP/USPS-9.

[a]     Please confirm, or explain if you are unable to confirm, that the weight of a mailpiece can be measured by a scale.

[b]     Please confirm that normally a mailer may disregard the changes to the weight of a mailpiece that is caused by changes in the relative humidity of the environment.

[c]     If you are unable to confirm, please enumerate the action that a mailer should take.

[d]     Please describe any action that is taken by the Postal Service to react to any changes to the weight of a mailpiece that is caused by changes in the relative humidity of the environment.

DBP/USPS-213                    Please refer to your response to Interrogatory DBP/USPS-14.

[a]     Please check the wording of your response.

[b]     Please confirm, or explain if you are unable to confirm, that the retail window clerks and processing plant personnel will need to have an easy to implement process to determine whether a First-Class Mail article weighing less than 13 ounces is a letter, flat, or parcel with particular emphasis on determining the thickness of the mailpiece.

[c] Please confirm, or explain if you are unable to confirm, that if there is no easy method available or if the method will require excessive window time that it should be considered in evaluating the approval of the proposed shape regulations.

[d] Please advise what types of methods are being considered.

DBP/USPS-214 Please refer to your response to Interrogatory DBP/USPS-15. My original interrogatory was designed to determine the methods that a mailer would have to utilize in order to comply with the DMCS/DMM requirements. What types of measuring devices and methods would be required to determine whether a single piece First-Class Mail article weighing less than 13 ounces is a letter, flat, or parcel with particular emphasis on determining the thickness of the mailpiece. Please respond to the original Interrogatory.

DBP/USPS-215 Please refer to your response to Interrogatory DBP/USPS-17 subparts c and d.

[a] Please advise when you believe will be the appropriate time?

[b] Please confirm, or explain if you are unable to confirm, that the implementation of the proposed regulations involved in this Interrogatory is an important consideration for the Postal Rate Commission to consider in evaluating approval of these regulations.

[c] Will the procedures be released in time for parties to conduct discovery on them?

[d] If not, why not?

[e] Will the procedures be released in time for parties to advise the Commission in their Briefs on them?

[f] If not, why not?

[g] Will mailers have an opportunity to comment on them?

[h] If so, how?

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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 July 6, 2006

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