

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

INTERROGATORY OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
WITNESS KIRK T KANEER [DBP/USPS-T41-9]

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."

July 13, 2006

Respectfully submitted,

R20061GGt41int9

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

DBP/USPS-T41-9 Please refer to your responses to Interrogatories DBP/USPS-T41-2 and 4.

[a] Please explain the meaning of each of the terms that are listed in the left column of Tables 1 through 3

[b] Please provide a listing of each of the different levels, ranges, or categories that apply to each of the terms listed in the left-hand column of Tables 1 through 3.

[c] Please advise how each of the numbers shown in the middle column of Tables 1 through 3 was derived.

[d] Please advise how each of the numbers shown in the right-hand column of Tables 1 through 3 was derived.

[e] Please provide an explanation showing what specific numbers were utilized in what specific calculation so as to arrive at the Erents that were shown for the three referenced facilities.

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 13, 2006
