

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate Commission  
Submitted 8/3/2006 9:59 am  
Filing ID: 51770  
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Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

FOLLOW-UP INTERROGATORY OF DAVID B. POPKIN TO THE UNITED STATES POSTAL  
SERVICE WITNESS KIRK T KANEER [DBP/USPS-T41-10]

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."

August 3, 2006

Respectfully submitted,

R200610Ot41int10

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

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DBP/USPS-T41-10 Please refer to your responses to Interrogatory DBP/USPS-T41-9.

[a] Please explain why the constant shown for the three offices is shown as 45.5187388 while the constant shown on page 102 of Part B of USPS-LR-L-125 for New York City is 35.74558. If this required a revised Erent value, please advise the new value.

[b] It would appear that each facility should have an entry of 1 in either the Nopark or SomePark entries. Please explain why Tenafly NJ has a 0 in both entries.

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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     August 3, 2006

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