

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-546-552]

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."

August 14, 2006

Respectfully submitted,

R20061YY546

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

DBP/USPS-546 Please explain the significance of including an eleven-page Motion of Douglas F. Carlson relating to DFC/USPS-RA-1 as pdf pages 144 through 154 of the Forever Stamp Library Reference USPS-LR-L-152 revised July 27, 2006.

DBP/USPS-547 Please refer to your response to Interrogatory DBP/USPS-366. Assume for purposes of this Interrogatory that the Forever Stamp regulations have been implemented as proposed and that the following omnibus rate case has been approved and

implemented where the one-ounce First-Class Mail letter rate is 45¢ and the one-ounce flat rate is 65¢.

[a] May the mailer of a one-ounce First-Class Mail flat utilize a Forever Stamp [purchased when the First-Class Mail letter rate was 42¢] and a regular 20¢ postage stamp to fully pay the postage.

[b] If not, why not?

[c] May the mailer of a one-ounce First-Class Mail flat utilize a Forever Stamp [purchased when the First-Class Mail letter rate is 45¢] and a regular 20¢ postage stamp to fully pay the postage.

[d] If not, why not?

[e] Please explain how the mailer will be able to distinguish between the Forever Stamp utilized in the scenario described in subpart a above and the Forever Stamp utilized in the scenario described in subpart c above.

[f] Please explain how the Postal Service will be able to distinguish between the Forever Stamp utilized in the scenario described in subpart a above and the Forever Stamp utilized in the scenario described in subpart c above.

[g] Please confirm, or explain if you are unable to confirm, that mailer and Postal Service confusion will result from the policy involved in making your responses to the above subparts of this Interrogatory.

DBP/USPS-548 Please refer to your response to Interrogatory DBP/USPS-368. Assume for purposes of this Interrogatory that the Forever Stamp regulations have been implemented as proposed and that the following omnibus rate case has been approved and implemented where the one-ounce First-Class Mail letter rate is 45¢ and the one-ounce parcel rate is \$1.10.

[a] May the mailer of a one-ounce First-Class Mail parcel utilize a Forever Stamp [purchased when the First-Class Mail letter rate was 42¢] and a regular 65¢ postage stamp to fully pay the postage.

[b] If not, why not?

[c] May the mailer of a one-ounce First-Class Mail parcel utilize a Forever Stamp [purchased when the First-Class Mail letter rate is 45¢] and a regular 65¢ postage stamp to fully pay the postage.

[d] If not, why not?

[e] May the mailer of a one-ounce First-Class Mail parcel utilize two Forever Stamps [purchased when the First-Class Mail letter rate was 42¢] and a regular 20¢ postage stamp to fully pay the postage.

[f] If not, why not?

[g] May the mailer of a one-ounce First-Class Mail parcel utilize two Forever Stamps [purchased when the First-Class Mail letter rate is 45¢] and a regular 20¢ postage stamp to fully pay the postage.

[h] If not, why not?

[i] Please explain how the mailer will be able to distinguish between the Forever Stamp utilized in the scenario described in subpart a above and/or the Forever Stamp utilized in the scenario described in subpart c above and/or the Forever Stamp utilized in the scenario described in subpart e above and/or the Forever Stamp utilized in the scenario described in subpart g above.

[j] Please explain how the Postal Service will be able to distinguish between the Forever Stamp utilized in the scenario described in subpart a above and/or the Forever Stamp utilized in the scenario described in subpart c above and/or the Forever Stamp utilized in the scenario described in subpart e above and/or the Forever Stamp utilized in the scenario described in subpart g above.

[k] Please confirm, or explain if you are unable to confirm, that mailer and Postal Service confusion will result from the policy involved in making your responses to the above subparts of this Interrogatory.

DBP/USPS-549

Please refer to your response to Interrogatory DBP/USPS-367.

Assume for purposes of this Interrogatory that the Forever Stamp regulations have been implemented as proposed and that the following omnibus rate case has been approved and implemented where the one-ounce First-Class Mail letter rate is 45¢ and the one-ounce flat rate [which is the rate also required for letters that have one or more nonmachinable characteristics] is 65¢.

Further assume that a mailer deposits two, one-ounce First-Class Mail articles that require postage at the flat rate of postage [65¢] either because the piece exceeds the dimensions for a letter or the mailpiece has one of the non-machinable characteristics. One of the articles has the postage paid with a Forever Stamp [purchased when the First-Class Mail letter rate was 42¢] and the second article has the postage paid with a regular, denominated 45¢ stamp.

- [a] Will both articles be treated in the same manner with respect to either being returned for additional postage and/or collection of postage due upon delivery?
- [b] Please advise what action will be taken on each of these two mailpieces.
- [c] Please provide the rationale for your responses to subparts a and b.

Now assume that a mailer deposits two, one-ounce First-Class Mail articles that require postage at the flat rate of postage [65¢] either because the piece exceeds the dimensions for a letter or the mailpiece has one of the non-machinable characteristics. One of the articles has the postage paid with a Forever Stamp [purchased when the First-Class Mail letter rate is 45¢] and the second article has the postage paid with a regular, denominated 45¢ stamp.

- [d] Will both articles be treated in the same manner with respect to either being returned for additional postage and/or collection of postage due upon delivery?
- [e] Please advise what action will be taken on each of these two mailpieces.
- [f] Please provide the rationale for your responses to subparts a and b.

[g] Please explain how the mailer will be able to distinguish between the Forever Stamp utilized in the scenario described in subparts a/b/c above and the Forever Stamp utilized in the scenario described in subparts d/e/f above.

[h] Please explain how the Postal Service will be able to distinguish between the Forever Stamp utilized in the scenario described in subparts a/b/c above and the Forever Stamp utilized in the scenario described in subparts d/e/f above.

[i] Please confirm, or explain if you are unable to confirm, that mailer and Postal Service confusion will result from the policy involved in making your responses to the above subparts of this Interrogatory.

DBP/USPS-550 Please refer to your response to Interrogatory DBP/USPS-299. In Question 1a of the Small Business Version, the interview will be terminated if the person is not the one using the U.S. Postal Service for mailing and shipping needs. Please explain why this did not refer to the purchasing of stamps rather than mailing and shipping needs.

DBP/USPS-551 Please refer to your response to Interrogatory DBP/USPS-299. In questions 18 through 24 and 29 through 30 of the Small Business Version and questions 18 through 24 of the Consumer Version, there were different scenarios supposed to be asked to

different small business owners. What method was utilized to randomly assign different respondents to different groups?

DBP/USPS-552 Please refer to your response to Interrogatory DBP/USPS-299. The instructions for Question 28 refer to "SKIP TO Q29", however, Question 29 does not appear in the Library Reference.

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 14, 2006
