

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-562-564]

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 22, 2006

Respectfully submitted,

R20061AAA562

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

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DBP/USPS-562

Please refer to your response to Interrogatory DBP/USPS-454.

[a] Please define the words "logically feasible" as used in your response.

[b] Please advise the specific conditions that would make the scenario described in subpart a of Interrogatory DBP/USPS-454 not logically feasible.

[c] The three dates that were provided in the example in subpart a of Interrogatory DBP/USPS-454 were selected arbitrarily. Assume that one is free to choose any three dates so long as they remain in the same order that was utilized in the original Interrogatory and that the time between the second and third dates was a minimum of two weeks, please confirm, or

explain if you are unable to confirm, that there is nothing that would preclude the Board of Governors from establishing an effective date for the modifications to the DMCS that were related to the Forever Stamp at an earlier time than the effective date for the remainder of the Opinion and Recommended Decision changes. This also assumes that there will be sufficient reasons for the Commission to recommend such as scenario.

DBP/USPS-563                      Please refer to your response to Interrogatory DBP/USPS-456. Please confirm, or explain if you are unable to confirm, that by use of the word "will" as the second word on the second line of the response, that the Postal Service has yet to evaluate potential changes to the regulations and procedures.

DBP/USPS-564                      Please refer to your response to Interrogatory DBP/USPS-457 subpart d. Please confirm, or explain if you are unable to confirm, that your response will still be the same if the purchase price of the Forever Stamp will be less than the then current post card rate.

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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 22, 2006

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