

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

FOLLOW-UP INTERROGATORY OF DAVID B. POPKIN TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-565]

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 22, 2006

Respectfully submitted,

R20061BBB565

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

DBP/USPS-565

Please refer to your response to Interrogatory DBP/USPS-455.

Assume for purposes of this Interrogatory that there are two possible implementation plans for the Forever Stamp. Plan A would have the implementation of the financial effects first available at the next rate case affecting the First-Class Mail letter rate [the plan that has been proposed by the Postal Service]. Plan B would require that the Forever Stamp be sold at 39¢ for a period of at least several weeks prior to the implementation of the First-Class Mail letter rate approved in Docket R2006-1.

Please confirm, or explain if you are unable to confirm, that the Postal Service has not evaluated the financial impact this would occur from the implementation of the Forever Stamp program either under Plan A or Plan B. If you are unable to confirm, please indicate the financial impact separately for both Plans A and B. If you are not able to provide the financial impact for both Plans A and B, please provide the reasons why the financial impact for the missing Plan or Plans has not been evaluated and determined. Please advise how any financial impacts were determined.

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
