

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-697-698]

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."

November 2, 2006

Respectfully submitted,

R20061111694

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

DBP/USPS-697
subparts c and d.

Please refer to your response to Interrogatory DFC/USPS-78

[a] Please advise when the revised response to Interrogatory DBP/USPS-541 will be filed.

[b] Please advise whether any follow-up interrogatories to Interrogatory DFC/USPS-78 will be due seven days after filing of that response or the filing of the revised response to Interrogatory DBP/USPS-541 which is referred to in the response to Interrogatory DFC/USPS-78.

DBP/USPS-698 Please refer to your response to Interrogatory DFC/USPS-79.

Your response indicates that the intended use of the Forever Stamp is on one-ounce single-piece First-Class Mail letter shaped pieces, and that other uses will be tolerated but not encouraged.

Please indicate how the concept of "tolerated but not encouraged" will appear in the

- [a] DMCS.
- [b] DMM.
- [c] Publicity information.

[d] Is this the first time that the Postal Service has adopted a concept of "tolerated but not encouraged"?

[e] If not, please indicate any other examples of "tolerated but not encouraged" that appear in the DMCS.

[f] Please advise what penalties or other adverse action will be taken against any mailers who take advantage of the "tolerated but not encouraged" use of the Forever Stamp.

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 November 2, 2006
