

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-699-700]

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 7, 2006

Respectfully submitted,

R20061KKK699

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

DBP/USPS-699
673.

Please refer to your response to Interrogatory DBP/USPS-

The Interrogatory asks for the status on any plans to expand or reduce the number of Automated Postal Centers [APCs] in service. This contemplates plans for a foreseeable

time in the future. Your response to Interrogatory DBP/USPS-673 appears to indicate that there were no additions or subtractions over some unspecified period in the past. Please discuss future plans.

DBP/USPS-700 Please refer to your response to Interrogatory DBP-USPS-684.

The fourth sentence of your response, as updated, states, "The Postal Service intends to give credit for such uses at the original purchase price."

The September 27, 2006, Federal Register states the following as the second sentence of the proposed revision to DMM Section 604.1.10, "The postage value of each forever stamp is the current First-Class Mail single-piece 1-ounce letter rate."

Please explain the conflict between these two. If the Postal Service intends to give credit at the original purchase price [as noted in the Interrogatory response], why are they providing a proposed DMM rule [in the Federal Register] which provides a postage value of the current letter rate as opposed to the original purchase price?

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 7, 2006
