

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

PREMIUM FORWARDING SERVICE

DOCKET NO. MC2007-3

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-11 through 21]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following follow-up interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. To the extent that a reference is made in the response 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 or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, 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."

September 24, 2007

Respectfully submitted,

MC20073B11

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

DBP/USPS-11 Please refer to your response to Interrogatory DBP/USPS-1 subparts a and b.

Please confirm, or explain if you are unable to confirm, that, according to the regulations and policies for PFS, the only way to accomplish the desired change referred to in Interrogatory DBP/USPS-1 in my Premium Forwarding Service would be to make a visit in person to the Englewood NJ Post Office.

DBP/USPS-12 Please refer to your response to Interrogatory DBP/USPS-1 subparts a and b.

[a] Please confirm, or explain if you are unable to confirm, that one of the purposes that a service that is being provided under an experimental service is to learn what changes might be made as a result of information learned during the experimental period.

[b] Please list those items that were learned during the experimental period.

[c] Please explain why the current docket does not include any of the customer needs and responses have not been included in this docket.

DBP/USPS-13 Please refer to your response to Interrogatory DBP/USPS-1 subpart e.

[a] Please confirm, or explain if you are unable to confirm, that if I were to file a Change of Address Order at the Boca Ration FL post office to forward my mail to me at my new Tampa FL location that the Boca Raton post office would not forward a Priority Mail article that arrived because it was a PFS shipment.

[b] Please advise what would happen to the piece of mail.

DBP/USPS-14 Please refer to your response to Interrogatory DBP/USPS-1 subparts g through m.

[a] Please confirm, or explain if you are unable to confirm and provide references to the specific regulations and policies, that the regulations and policies that exist for PFS provide for one answer to all of those questions, and that is to show up IN PERSON at the Englewood NJ post office and transact your business there.

[b] Please confirm, or explain if you are unable to confirm, that any postal employee who allows for any changes to be made by any other means other than an IN PERSON visit to the Englewood NJ post office is doing so either because they are not fully aware of the complete regulations and policies and/or are just doing what they feel is appropriate to meet the needs of the customer.

[c] Please advise what weight, if any, should be given to the ability of the postal employee to recognize the voice and/or handwriting. Please explain your response.

DBP/USPS-15 Please refer to your response to Interrogatory DBP/USPS-1 subpart n. I am not asking what the customer satisfaction would be to the responses to written cross-examination in litigation but to what it is believed would be the customer's reaction to having received responses that indicated that they would be required to make an in person visit to the Englewood NJ post office to transact their business. Please provide that response.

DBP/USPS-16 Please refer to your response to Interrogatory DBP/USPS-2 subparts a and b. Please confirm, or explain if you are unable to confirm, that, according to the regulations and policies for PFS, the only way to accomplish the desired change referred to in Interrogatory DBP/USPS-2 in my Premium Forwarding Service would be to make a visit in person to the Englewood NJ Post Office.

DBP/USPS-17 Please refer to your response to Interrogatory DBP/USPS-3 subpart a. Please confirm, or explain if you are unable to confirm, that, according to the regulations and policies for PFS, the only way to accomplish the desired change referred to in Interrogatory DBP/USPS-3 in my Premium Forwarding Service would be to make a visit in person to the Englewood NJ Post Office.

DBP/USPS-18 Please refer to your response to Interrogatory DBP/USPS-5 subparts e through g.

Please confirm, or explain if you are unable to confirm, that since the Postal Service claims that the current proposal seeks only to make permanent the form of PFS now offered as an experiment that there has been no evaluation of any potential need for

expanding the methods by which a customer may sign up for PFS or modify an existing order.

DBP/USPS-19 Please refer to your response to Interrogatory DBP/USPS-8 subpart c.

Please confirm, or explain if you are unable to confirm, that COA vs. PFS goes beyond just involving customer addresses, namely both of them relate to the forwarding of a customer's mail from one address to another address.

DBP/USPS-20 Please refer to your response to Interrogatory DBP/USPS-8 subpart d.

Please explain why you believe that the presentation in person of a government issued photo ID card at the local post office and completing and signing a form is not necessarily more secure than just dropping a PS Form 3675 in the local blue collection box anywhere in the country.

DBP/USPS-21 Please refer to your response to Interrogatory DBP/USPS-9.

Please provide specific responses to each of the six subparts rather than a generalized response to the overall context of the Interrogatory.