

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

EXPERIMENTAL PRIORITY MAIL
FLAT-RATE BOX, 2004

Docket No. MC2004-2

DAVID B. POPKIN
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-T1-1-10]

June 21, 2004

I hereby submit interrogatories to the United States Postal Service. The instructions contained in the interrogatories DFC/USPS-1-18 dated May 19, 2001, are incorporated herein by reference.

Respectfully submitted,

June 21, 2004

David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

MC20042D

DBP/USPS-T1-1 In your response to Interrogatory DBP/USPS-T2-11 subpart h, you indicate that you were not aware of any customer confusion. Please redirect this subpart to the United States Postal Service for an institutional response from any qualified individual.

DBP/USPS-T1-2 In your response to Interrogatory DBP/USPS-T2-11 subpart h, you indicate that you do not believe that there will be a similar confusion with respect to the proposed flat-rate box and lower non-flat-rate postage options. [a] Please provide the basis for this belief. [b] In the discussion for this proposed rate, did any of the participants express a concern? [c] If so, please provide details of their concern.

DBP/USPS-T1-3 Please confirm, or explain any items you are not able to confirm, that a sophisticated mailer utilizing Priority Mail, will normally have access to a scale to determine the weight of the article, a zone chart or other availability to determine the mailing zone, a rate chart or other availability to determine the necessary postage rate and knowledge of the proposed flat-rate box postage and will either choose the option that has the lower of the two rates or will make an educated decision to utilize the higher of the two rates for a perceived convenience.

DBP/USPS-T1-4 [a] Please advise the types of sophisticated mailers and the perceived conveniences you believe that they will have which will cause them to choose to utilize a flat-rate box when the postage for its use will be greater than the non-flat-rate postage. [b] Please provide an Exhibit similar to Exhibit B showing the positive changes in revenue resulting from mailers utilizing the flat-rate box when the postage is higher for its use.

DBP/USPS-T1-5 [a] Please confirm, or explain if you are not able to confirm, that an unsophisticated mailer utilizing Priority Mail, may not normally have access to a scale to determine the weight of the article, a zone chart or other availability to determine the mailing zone, a rate chart or other availability to determine the necessary postage rate and knowledge of the proposed flat-rate box postage. [b] Please advise the sources that an unsophisticated mailer will have to obtain a USPS box of the flat-rate box size for use in shipping an article by Priority Mail. [c] Please provide your best estimate as to the percentage of the total that each of the sources will represent. [d] Please provide the information the Postal Service will provide with each of these sources to allow the mailer to make an educated decision as to whether to choose a flat-rate box or a similar sized non-flat-rate box.

DBP/USPS-T1-6 Please refer to lines 16 to 18 on page 3 of your testimony in which you indicate that there were 5,368 parcels sampled in the study. Please advise the level of confidence that this sample size will provide.

DBP/USPS-T1-7 Does the calculation starting at line 18 of page 3 of your testimony utilize only those parcels that would fit into either or both of the proposed flat-rate boxes? If not, why not?

DBP/USPS-T1-8 Does the calculation starting at line 18 of page 3 of your testimony utilize only those parcels that would choose either or both of the proposed flat-rate boxes as the best fit box when compared to other USPS boxes that are available for use? If not, why not?

DBP/USPS-T1-9 Please refer to footnote 5 on page 4 of your testimony. [a] Please confirm, or explain if you are not able to confirm, that a common use of a flat-rate envelope is for mailing paper items that are approximately 8-1/2 by 11 inches in size and that the flat-rate envelope will only hold a limited thickness of the contents and that the proposed 14 by 12 by 3-1/2 inch proposed flat-rate box will provide a convenient substitute for mailing these paper items when the thickness is greater than the flat-rate envelope will conveniently hold. [b] If heavier flats were considered in the analysis, what changes would result and provide the revisions?

DBP/USPS-T1-10 The Federal Register for February 26, 2004 [69FR8899] contains a proposed change to DMM Section C010.2.3c which would limit the density of items weighing more than 15 pounds to 60 pounds per square foot on the smallest side of the mailing container. If this proposed rule were to be adopted as written, it would limit the weight of the 14x12x3.5 inch box to 17.50 pounds and the 11.25x8.75x6 inch box to 21.88 pounds. Please advise how this would affect your analysis and provide the revisions.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

June 21, 2004

David B. Popkin