

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN
(DBP/USPS-697 and 698)

The United States Postal Service hereby provides its institutional responses to interrogatories DBP/USPS-697 and 698, which were filed on November 2, 2006. The interrogatories are stated verbatim and followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-697 Please refer to your response to Interrogatory DFC/USPS-78 subparts c and d.

- [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.

RESPONSE

- (a) No plans for doing so have been formulated. The citation was intended to be to DBP/USPS-341, which was revised on October 11, 2006.
- (b) See the response to subpart (a). In any event, this question seems to request an interpretation of the Commission's Rules of Practice and Procedure, as opposed to factual information relevant to some substantive issue in this docket. Accordingly, no response is deemed to be required.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

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.

RESPONSE

- (a) Any comparison of the DMCS and the DMM leads to an appreciation for the fact that not all details relevant to each rate category are reflected in the former. In this regard, the Postal Service's proposed Forever Stamp is not unusual.
- (b) In the form of words.
- (c) In the form of words and/or graphics that will be determined at some appropriate future date.
- (d) Given the varied nature of the billions and billions of postal customer transactions over the past 36 years, that seems unlikely.
- (e) N/A.
- (f) It is unclear why the Postal Service would penalize or take adverse action against mailers who engage in activity that is explicitly not prohibited.