

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

EXPERIMENTAL PREMIUM
FORWARDING SERVICE

Docket No. MC2005-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS ARNETTA L. COBB
TO INTERROGATORIES OF DAVID B. POPKIN
(DBP/USPS-T1-1-21)
(December 8, 2004)

The United States Postal Service hereby files the responses of witness Arnetta L. Cobb to the following interrogatories of David B. Popkin: DBP/USPS-T1-1-21, filed on November 24, 2004.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-1. On line 11 of page 1 of your testimony, you indicate that this service is for sending mail from a primary address to a temporary address.

- (a) Would a customer be able to use the service if they make a permanent move?
- (b) If not, why not?

RESPONSE:

(a) Yes, but it is highly unlikely customers would use PFS for a permanent move. It would be less costly for customers to file a permanent Change of Address (PS Form 3575) and notify mailers of their new permanent address. Customers cannot enroll in Premium Forwarding if an active Change of Address Order is on file, and vice versa.

(b) N/A

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-2. On line 19 of page 1 of your testimony, you indicate that a customer would receive substantially all of their mail in one package.

- (a) What types of containers does the postal service contemplate using in this service (please provide a complete listing including the type of container {e.g. envelope, box, etc.}, dimensions, empty weight of the container, and the maximum weight of the container if it were filled with paper)?
- (b) If the postal service employee feels that the volume of mail would warrant two or more containers, would that be permitted?
- (c) if not, why not?
- (d) If so, would the charge still be the same?
- (e) What will happen if the volume of mail is too large for the container under the condition where the volume is caused by a large quantity of pieces, none of which could be characterized as a package or parcel?

RESPONSE:

(a) The size of mailing container would vary depending on the makeup and volume of mail. In most instances, the Postal Service would use its existing Priority Mail supplies. Since various paper types have different weights, there is no single weight that would be applicable to any particular paper-filled container. The following links display the apparent full range of Priority Mail envelopes and packages on USPS.com. The respective box numbers that would likely be used in PFS are: 0-1092, 0-BOX4, 0-BOX7, 0-1095, 0-1096L, 0-1096S, 0-1097, 0-1098S, and 0-1098M. The envelopes that would likely be used in PFS include: EP 14, EP 14-B, EP 14-H, and EP 14-F.

http://shop.usps.com/cgi-bin/vsbv/postal_store_non_ssl/display_products/productCategory.jsp?cat=Business+Use&prodCat=/Shipping+Supplies/Business+Use/2.+Priority+Mail

http://shop.usps.com/cgi-bin/vsbv/postal_store_non_ssl/display_products/productCategory.jsp?prodCat=/Shipping%20Supplies/Business%20Use/2.%20Priority%20Mail&prodCatCursor=8&passFlag=2

http://shop.usps.com/cgi-bin/vsbv/postal_store_non_ssl/display_products/productCategory.jsp?cat=Personal+Use&prodCat=/Shipping+Supplies/Personal+Use/2.+Priority+Mail

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

(b)-(e) An appropriately sized container would be used to reship the customer's mail, provided the mailing meets Postal Service size and weight (70 lbs.) requirements. Parcels would not automatically require use of larger sized containers, since they may or may not be included. If mail volume for a given week exceeds these size and weight requirements, not including parcels, two or more containers would be necessary. PFS is aimed at households and residences, not business customers, with cost estimates assuming a single package; this provides some assurance that the difficulties suggested by the question would not arise. However, PFS is proposed as an experiment, in part to determine whether our expectations regarding volume and weight are fulfilled. As proposed, no change in the per-shipment charge would result if two or more containers are necessary. However, postal officials would possibly consider researching such a situation to determine whether that customer is eligible for PFS.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-3. On line 21 of page 1 of your testimony, you indicate that the service would be available to an entire delivery address or for one or more individual residents. For purposes of this interrogatory, assume that there are five individuals at the delivery address, A B C D and E.

- (a) Can A subscribe to the service and the mail for B C D and E will be delivered as addressed?
- (b) Can A and B subscribe to the service for forwarding to the same address and at the single price and the mail for C D and E will be delivered as addressed?
- (c) Can A and B subscribe to the service for forwarding to different addresses and at two separate prices and the mail for C D and E will be delivered as addressed?
- (d) Can A B C D and E subscribe to the service for forwarding to two or more different addresses and at the number of prices as there are different addresses?
- (e) Please explain any negative responses.

RESPONSE:

(a)-(e) As described in Section III.A of my testimony, an individual could subscribe to PFS and the mail for the rest of the household would continue to be delivered to the permanent address. Multiple individuals within a household could also fill out individual PFS applications to have their respective mail reshipped, and entire households could have all of the mail for the primary address reshipped. Applications would be for a single individual's mail or for an entire household's mail only. Thus, while households could apply as a unit and pay one fee for the entire household's mail to be reshipped, individuals would apply separately and each would pay the fees. Two or more individuals could not share one application unless doing so involved the entire household's mail.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-4. On lines 2 and 3 of page 2 of your testimony, you indicate that PFS would only be available to and from domestic addresses. Confirm that mail which originates outside of the United States and arrives at the primary address located in the United States can be forwarded to any address within the United States.

RESPONSE:

As proposed, PFS would provide for the reshipment of all mail addressed to a primary domestic address (whether for one or more, or all, addressees) to a temporary domestic address.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-5. On lines 4 thru 8 of page 2 of your testimony, you indicate that a similar program has been utilized in some offices and districts.

- (a) Please provide copies of any publicity or instructions that were utilized in your evaluation and determination of the PFS.
- (b) Please provide an estimate of the percentage of informal shipments that had postage paid by official mail vs. payment of postage.
- (c) In those cases where the postage was paid, describe the arrangements that existed.
- (d) What was the regulatory authority that permitted these informal arrangements?
- (e) If PFS is established, will that regulatory authority be removed?

RESPONSE:

(a) The information I gathered regarding the existing, informal options was through personal contact, primarily two postal officials from field offices that offered these services. As such, I really did not rely upon any “publicity or instructions” that were used in the field. Nevertheless, I am attaching to this response copies of materials from those two employees’ offices that illustrate how their informal programs operated.

(b)–(c) I am unable to estimate the percentage of informal shipments that bore postage or official mail indicia. To my knowledge, no quantitative study of all the field offices’ activities has been conducted. Payment for these informal arrangements entailed customer presentation of prepaid Priority Mail Flat Rate envelopes or deposit by a customer of funds in a postal administered account. The latter method permitted weighing and rating of each package.

(d)–(e) While I am not a lawyer, I know of no “regulatory authority” for these informal arrangements. I do understand that, if implemented, PFS would replace all of the informal arrangements.



PRIORITY RESHIPPING SERVICE

TALKING POINTS FOR THE OFFICE STAFF

TARGET YOUR CUSTOMERS

Clerks: Offer to discuss this service with any individual who asks about *temporary* address change information. If a customer asks about filing an address change, *always* be sure to inquire if it is a permanent change OR a temporary change of address. You may need to explain the differences to them. Be clear to the customer about the differences between conventional *temporary* forwarding and *PRIORITY RESHIPPING SERVICE*.

Carriers: Mention this service to your customers who have traveled/vacationed/wintered for extended periods of time in the past.

PAYMENT

The customer purchases and applies sufficient *PRIORITY MAIL* postage to the *PRIORITY MAIL* envelopes that they address. The \$3.85 rate will cover whatever mail will fit into the normal dimensions of the "as much as you can stuff" *PRIORITY MAIL* Flat Rate mailer (EP-14F). The \$3.85 rate also covers mailings that weigh up to one pound that are sent in other *PRIORITY MAIL* mailers such as the *PRIORITY MAIL* tyvek mailer (EP-14).

If a customer prefers reshipping by *Express Mail*, honor their preference.

You may offer two options: 1) the customer purchases a sufficient quantity of *Express Mail* stamps and affixes them to *Express Mail flat rate* half pound envelopes (EP-13F)

OR

2) the customer opens an *Express Mail Corporate Account* to pay for their reshipment mailings.

POSSIBLE COMMENT AND SUGGESTED RESPONSE

There is a "free" forwarding system, why should a customer pay for the same thing?

There is much confusion internally *and* externally regarding forwarding procedures, especially as they relate to *temporary address change* customers. Basically, for those individuals who will be away from their permanent address for extended periods of time, *some* classes of mail can not be forwarded to them for that entire time.

The *PRIORITY RESHIPPING SERVICE* option *allows the customer to decide* whether to receive *all classes* (or whichever classes they designate) of mail on a continuing basis for as long as they have prepaid the postage. Normally, **periodicals** (magazines and newspapers) are **only forwarded on a temporary forward for 60 days**, but many "snowbirds" winter at their temporary address for a longer length of time. Additionally, many small groups' (volunteer associations, religious institutions and non-profit organizations) written correspondence and newsletters are mailed at the **Standard Mail rate without any forwarding endorsements**. For many of our customers, this mail is important to them and they would like to continue to receive it at their temporary address.

It is true that First Class Mail, Express Mail and Priority Mail ARE entitled to forwarding without any additional charges, but our customers should be made aware of this **optional** RESHIPPING service. They may conclude that the current forwarding system meets their needs, or they may be delighted to find out that there is a way to receive their magazines, newsletters and other mailings important to them in an uninterrupted fashion by deciding to sign-up for *PRIORITY RESHIPPING SERVICE*.

ESTABLISH STANDARD OFFICE PROCEDURES

COMPLETING THE *PRIORITY* RESHIPPING SERVICE CARD

Clerks: Be sure to review the completed *PRIORITY* RESHIPPING SERVICE card *while the customer is still present* to be sure that the customer's wishes are clearly indicated on the card. No matter how obvious the instructions may seem to you, go over the information with the customer saying, "I would like to review your instructions with you so that I can be sure that the office staff will comply with your directions." Sometimes abbreviations or poor penmanship can create unintended confusion for others.

Carriers: If you assist someone in completing a *PRIORITY* RESHIPPING SERVICE card follow the directions above.

PAYMENT OPTIONS

The customer purchases and applies sufficient *PRIORITY* MAIL postage to the *PRIORITY* MAIL envelopes that they address. The \$3.85 rate will cover whatever mail will fit into the normal dimensions of the "as much as you can stuff" *PRIORITY* MAIL Flat Rate mailer (EP-14F). The \$3.85 rate also covers mailings that weigh up to one pound in other *PRIORITY* MAIL mailers such as the *PRIORITY* MAIL tyvek mailer (EP-14).

(If the customer requests it, *Express Mail* reshipping can be available.)

RESHIPPING OPERATIONS

Clerks: Know where the temporary change of address card (*PRIORITY* RESHIPPING SERVICE card) and the *prepaid* mailers are to be put when they are received from the customer.

Carriers: Be familiar with the *PRIORITY* RESHIPPING SERVICE option selected by your customers and separate/reship their mail accordingly. A customer's participation in this service applies only to the classes of mail indicated by the customer on the *PRIORITY* RESHIPPING SERVICE card. **Any class of mail not indicated on the card should be handled according to applicable forwarding procedures for temporary address change customers.**



PRIORITY RESHIPPING SERVICE

VACATIONING?

"WINTERING" ELSEWHERE?

TRAVELING?

While you're away, keep in touch.

Your local Post Office offers an **optional** method of reshipping your mail for **temporary address change** customers.

ALL your mail can be reshipped directly to you via **Priority Mail**.

You only pay the postage.



Designed for temporary address change customers.

You create a reshipping plan that meets *your* needs.

You decide the frequency/day of the week for reshipping your mail.

You decide what mail you want reshipped.

You decide the reshipped address(es)* for each shipment of your mail.

Here's how it works....

Your mail, placed in **PRIORITY MAIL** mailers, is reshipped to you according to *your* instructions.

You purchase a sufficient quantity of **PRIORITY MAIL** stamps to cover your reshipping needs while you are away. We'll supply enough **PRIORITY MAIL** Flat Rate envelopes to meet your planned needs.

You write the reshipped address on the **PRIORITY MAIL** Flat Rate envelope and affix a **PRIORITY MAIL** stamp. You complete a **PRIORITY RESHIPPING SERVICE** card. We send you the mail you designate according to *your* indicated schedule on the card.

Using flat-rate mailers, as much mail as can fit in the flat-rate envelope will be reshipped to you -- wherever you go*!

*If you're traveling, prepare the envelope with the proper address for each stop and tell us the date to mail to each address. **Only domestic addresses are eligible at this rate.**

THE POST OFFICE STAFF WILL BE HAPPY TO ASSIST YOU!

03filer.doc

UNITED STATES POSTAL SERVICE
PRIORITY RESHIPping SERVICE CARD

Postmaster: Reship mail under this **temporary** change of address form by Priority Mail.

Name(s): _____

PERMANENT LOCAL

Address: _____

City: _____ State: _____ ZIP: _____

TEMPORARY RESHIPping

Address: _____

City: _____ State: _____ ZIP: _____

First Reship Date: _____ Last Reship Date: _____

Total Number of Shipments: _____ Frequency of Shipments: _____

Please reship the types of mail indicated.

FIRST CLASS	Yes	_____	No	_____
PERIODICALS	Yes	_____	No	_____
STANDARD MAIL	Yes	_____	No	_____

Rates subject to change may cause mail to arrive "Postage Due."

PAYMENT METHOD

Postage stamps purchased and affixed to customer-addressed *Flat Rate* mailers.

() **PRIORITY Mail**

Priority 1 lb. (EP-14F, Flat Rate) = \$3.85 as of 06-30-02

() **Express Mail**

Express Mail 1/2 lb. (EP-13F, Flat Rate) = \$13.65 as of 06-30-02

TOTAL POSTAGE PURCHASED: \$ _____
 for PRIORITY RESHIPping SERVICE

Special instructions/directions if item is too large or heavy to be placed in mailer.

Customer Signature: _____ Date: _____
03cardfr.doc 07/29/02

UNITED STATES POSTAL SERVICE
PRIORITY RESHIPping SERVICE CARD

Postmaster: Reship mail under this **temporary** change of address form by Priority Mail.

Name(s): _____

PERMANENT LOCAL

Address: _____

City: _____ State: _____ ZIP: _____

TEMPORARY RESHIPping

Address: _____

City: _____ State: _____ ZIP: _____

First Reship Date: _____ Last Reship Date: _____

Total Number of Shipments: _____ Frequency of Shipments: _____

Please reship the types of mail indicated.

FIRST CLASS	Yes	_____	No	_____
PERIODICALS	Yes	_____	No	_____
STANDARD MAIL	Yes	_____	No	_____

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() **Express Mail**

Express Mail 1/2 lb. (EP-13F, Flat Rate) = \$13.65 as of 06-30-02

TOTAL POSTAGE PURCHASED: \$ _____
 for PRIORITY RESHIPping SERVICE

Special instructions/directions if item is too large or heavy to be placed in mailer.

Customer Signature: _____ Date: _____
03cardfr.doc 07/29/02

ATTACHMENT PG 4

EMPLOYEE INSTRUCTIONS

The Customer will:

- (a) complete the *PRIORITY* RESHIPPING SERVICE card.
- (b) purchase stamps and affix to *PRIORITY flat rate* mailers¹.
- (c) address *PRIORITY* mailers with desired reshipping address.

The Postal Employee will:

- (1) put the addressed prepaid *PRIORITY* mailers and this card in the "Hold" section.
- (2) alert the appropriate carrier of the customer's "Hold" status.
- (3) ensure that the designated individual reships mail* from the "Hold" section per customer's instructions.

***NOTE:** *Accountable mail* MUST be forwarded separately.

¹ Rates subject to change may cause mail to arrive "Postage Due."

The above is general reference, be sure to follow all local office procedures!!

Our customers deserve the best service. Working together, we will deliver it.

03cardbk.doc

EMPLOYEE INSTRUCTIONS

The Customer will:

- (a) complete the *PRIORITY* RESHIPPING SERVICE card.
- (c) purchase stamps and affix to *PRIORITY flat rate* mailers¹.
- (c) address *PRIORITY* mailers with desired reshipping address.

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- (1) put the addressed prepaid *PRIORITY* mailers and this card in the "Hold" section.
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- (3) ensure that the designated individual reships mail* from the "Hold" section per customer's instructions.

***NOTE:** *Accountable mail* MUST be forwarded separately.

¹ Rates subject to change may cause mail to arrive "Postage Due."

The above is general reference, be sure to follow all local office procedures!!

Our customers deserve the best service. Working together, we will deliver it.

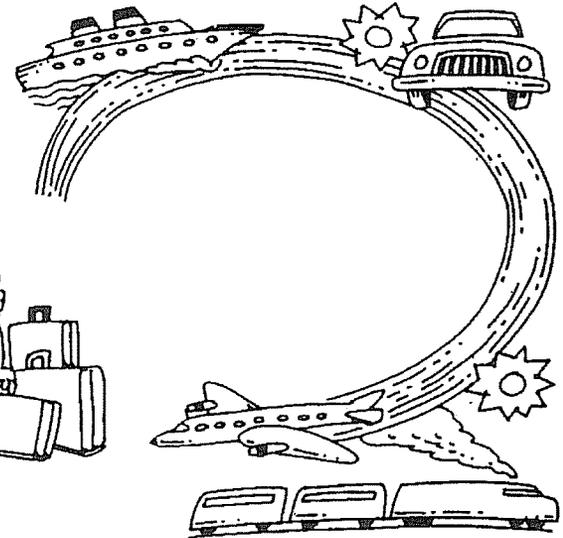
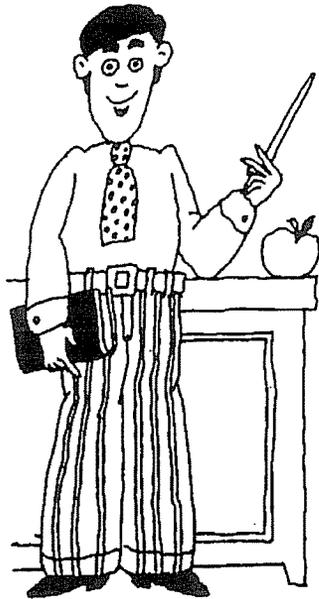
03cardbk.doc



PRIORITY RESHIPPING SERVICE*

*An optional service for temporary address change customers.

No matter how you get there



Make sure your mail follows you!



Complete a **Priority Reshipping Service** card today.
The office staff will be glad to explain the details.

ATTACHMENT Pg 6



PRIORITY RESHIPPING SERVICE*

*An optional service for temporary address change customers.



Wandering in
Walla Walla?



Aiming for
Augusta?



Destined for
Diamond Head?

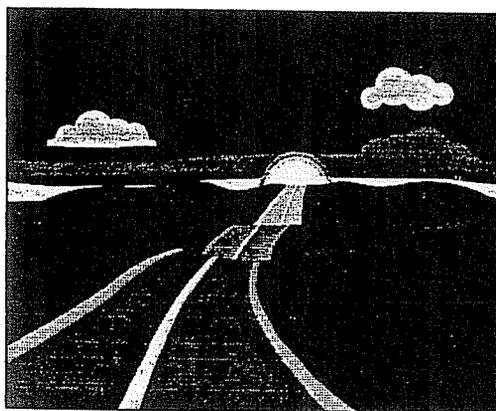
Let your mail follow you!



- Complete a **Priority Reshipping Service Card**
- Purchase your Priority Mail postage
- Address your mailing labels & affix postage

ATTACHMENT Pg 7

“SNOWBIRD RESHIP” PROGRAM



A premium service for postal customers traveling or temporarily away from home!

Introduction

Many customers request their mail be forwarded each year. This booklet provides a reference for your use to better meet the needs of our customers in the forwarding of mail.

The **SNOWBIRD RESHIP** service offers customers a personalized, expedited Priority reshipment of their mail when they are temporarily away from home on business or pleasure. While the name implies it is for customers who go to warmer climates during the winter season, it is a service that can be utilized by any postal customer who is temporarily away.

The **“SNOWBIRD RESHIP”** service is the batching and weekly “reshipping” of all classes of a customer’s mail to his or her temporary address, as long as the end date of requested service to that address is at least two weeks, but not more than one year ahead.

Customers have the option to select what they want and how often they wish us to reship their mail via Priority Mail. Express Mail can be used for more urgent circumstances. The wide variety of packaging supplies available for Priority Mail can accommodate almost any volume of mail the customer wishes to have reshipped. **The only expense to the customer is the appropriate amount of postage.**

Because postmasters, clerks, and carriers often know which customers travel frequently on business or for pleasure, you are in an excellent position to make sure those special customers know about our **“Snowbird Reship”** service. Customer kits are available to give to a customer filing a Temporary COA or one you know travels for business or pleasure. The kit explains the reshipment program and provides an application card.

SECTION ONE
INSTRUCTIONS

ATTACHMENT PG 10

“SNOWBIRD RESHIP” PROGRAM IMPLEMENTATION GUIDELINES

The Snowbird Reship program is available to customers in all ZIP Code areas in the It is available to any customer who will be temporarily away from their permanent address between two weeks and up to one year. The program consists of batching and reshipping any class of a customer's mail to his/her temporary address. The ending date of the requested service to that address must be at least two weeks, but no more than one year ahead.

1. “SNOWBIRD RESHIP” SERVICE is available to all customers upon request in the as an alternative to the Free Forwarding provided through CFS units. Customer kits are available to use in promoting the program locally.

Any customers (vacationers, college students, seasonal movers, custom harvesters, etc.) who will be temporarily away from their permanent address between two weeks and one year can request and receive this service.

Carriers, clerks, and postmasters know which customers can benefit from the RESHIP service. A customer kit containing a letter from the postmaster and an application card can be provided to each potential user advising them of the program.

2. Employees are to hold out mail for “Snowbird Reship” customers as they would for others whose mail is being held. This mail is to be treated consistently with existing HOLD MAIL procedures with the added provision that it is to be reshipped by Priority Mail or Express Mail at the customer's request and expense.
3. All customers must prepay the correct postage for the mailing service chosen for reshipment. Postage for reshipment of mail must be prepaid at the standard rate for the class of service chosen by the customer. The classes of the content mailpieces in the reshipments have no relevance to the rate charged for reshipment postage.
4. “SNOWBIRD RESHIPMENT” service is not to be confused with, or represented to customers, as “forwarding.” “RESHIPPED” mail is not the same as “forwarded” mail. “Forwarded” mail is processed through our mail forwarding sites (CFS) in accordance with specific existing procedures.
5. RESHIPMENT POSTAGE WILL NOT BE SOLD ON CREDIT. Customers may purchase stamps or postmasters may establish POSTAGE TRUST ACCOUNTS to accommodate prepayment of postage. (*Postage Trust Accounts for the Snowbird Reship Program DO NOT NEED TO BE APPROVED BY FINANCE.*)
6. ADEQUATE POSTAGE must be applied to cover the shipping weight of the parcel. This will eliminate “postage due” charges at the destinating post office.
7. Customers who choose Express Mail may establish a standard Express Mail Corporate Account at the postal unit serving their permanent address or customers may preaddress and prepay postage on Express Mail envelopes. For customers choosing Priority Mail, the appropriate size Priority package should be used to reship the customer's mail depending on the volume. Flat rate envelopes must not be overfilled beyond the envelope capacity.
8. Be sure to identify SNOWBIRD RESHIP mail as being sent from a Post Office by using your office name and address for the return address. **PRIORITY PACKAGES WITH NO RETURN ADDRESS ARE REMOVED FROM AIRPLANES BECAUSE, ACCORDING TO FAA GUIDELINES, THEY LACK THE REQUIRED RETURN ADDRESS.**

ATTACHMENT PL 11

"SNOWBIRD RESHIP" SERVICE

"HOW TO" FOR POSTMASTER, MANAGERS AND SUPERVISORS

A. Postmaster, Managers and Supervisors need to:

1. Make customers aware of the service.
2. Obtain customer authorization in writing using **Form SRS 1**, Application Card for Customers. This provides us with permission from the customer to perform this service. These cards must be maintained at the delivery unit and should be filed securely as documentation of the customer's request.
3. Make certain the dates of temporary relocation fall between two weeks and one year.
4. Help customer determine how many prepaid envelopes must be prepared to serve their needs. **There is to be no credit utilized.** Provide envelopes and labels for the customers to use in addressing and applying prepaid postage. **OR**
5. Establish a "postage trust" account to track funds left by the customer to be used in reshipping their mail. (Contact _____ if you need assistance.) If funds have been used up, they must be replenished before shipments can resume. **There is to be no credit utilized.**
6. Assist customers in opening a corporate account for funds to reship by Express Mail, if that option is chosen.
7. Ensure the mail is batched and reshipped as agreed upon using the customers choice of service.

B. Clerks/Carriers need to:

1. Carrier annotates PS Form 3982, *Changes of Address*, Including the actual expiration date under regular procedures.
2. Place a case card for carrier/clerk, **Form SRS 5**, to be used to remind staff that this mail is to be reshipped to customer's temporary address.
3. Bundle mail and follow existing hold procedures.
4. Take the appropriate measures to ensure security of customer's prepaid envelopes.
5. Once a week, unless otherwise instructed by the customer, batch and reship mail per customer's instruction. Include a tracking card, **Form SRS 2**, to advise us as to how we are doing with the service. The carrier will enter the date the shipment was entered in the mail. The customer will note the date he/she received the shipment, and then drop the postage-paid card in the mail.
6. Reshipping will cease 7 days prior to ending date of customer's extended time away.
7. Upon return, the customer must pickup the accumulated mail. At that time, a Customer Comment Card, **Form SRS 3**, is given to the customer to fill out and drop in the mail.



SNOWBIRD "RESHIP" SERVICE



MOST FREQUENTLY ASKED QUESTIONSAnd the Answers!

Q. I can't get all my customer's mail into the flat-rate envelope. Sometimes I have to use tape to ensure the package holds together. What should I do?

A. Depending on the volume of mail that the customer normally receives, and what classes of mail the customer wants reshipped, you may need to use a different Priority package. You may use any of the Priority packaging materials as long as the appropriate postage is applied for the weight.

Q. I used the flat-rate envelope to reship a customer's mail and it was delivered "Postage Due." My customer was not very happy at having to pay more postage. What can I do?

A. This happens because the package is overstuffed for the packaging material. If you have a trust account for this customer's postage, you can choose a larger Priority envelope or box and apply the appropriate postage for the weight of the material. This will eliminate mail being delivered Postage Due at the other end.

Q. I have a customer who travels frequently. Although he is not a "Snowbird," he is requesting this service. Can I provide it?

A. Most definitely! The Snowbird "Reship" process is no longer only for seasonal vacationers. Many customers are frequently away from home for business or pleasure and prefer the use of the Priority Reship service to our normal Centralized Forwarding process. It is more convenient, timely and easy to use. Also, CFS cannot successfully provide service to those customers who are moving from place to place. The mail never has a chance to "catch up" to the customer. However, the Snowbird Reship process offers customers the opportunity to call and tell their postmaster where to send the reshipment so it will be available when they arrive. This works particularly well for custom harvesters, and those with similar jobs, who are usually in an area for only a few days before following the work and moving on. Since you cannot accept collect calls from customers, postmasters and retail clerks have an excellent opportunity to sell customers the USPS phone card. Customers will love the convenience of being able to make that phone call back home without using coins, calling cards, etc. Phone cards are available in a wide variety of denominations at all post offices.

Q. My customer receives certified mail quite often. Using the Snowbird Reship program, how would I handle this mail?

A. Accountable mail must not be included in any Reshipment. It is to be re-labeled with the customer's temporary address, documented on a PS Form 3849 and sent on to the destination for delivery. (The Snowbird Implementation Guidelines lists the names of postmasters in the District that can provide labels. A minimum of ten labels should be requested for each Snowbird Reship customer and kept on hand for use in these situations.)

Q. My customer uses the "free" forwarding service provided by CFS. This last year there were problems with correspondence from tax assessors and financial institutions not being delivered. Letters were returned with a label stating "Temporarily Away." My customer was assessed late fees and was concerned about how this could be happening.

A. We had many complaints from customers for the same reason. Investigation revealed that mailers using the endorsement "Return Service Requested" were receiving first-class statements and billing notices back advising that the addressee was away. CFS does not provide new addresses for temporary COAs. The mailers of this type of correspondence received instructions to re-envelope the mail and resend it without any endorsement so it could be forwarded by CFS. However, this did not always happen. Admittedly, this is a serious problem for our customers, but it can be eliminated when a customer uses the Snowbird Priority Reship program because mail is re-shipped to those who are temporarily away. It is a reshipment, not a forwarding.

Q. My customer wants his newspaper forwarded for more than 60 days.

A. The Snowbird Reship program gives us the leeway to do that. CFS and the "free" forwarding service provided does not.

Q. My customers go south to Texas every year. They used the Snowbird Priority Reship program, but their shipments did not arrive within the 2-3 day service commitment.

A. We have experienced some delays to various parts of the country, even with Priority Mail. The areas of delay pinpointed by feedback from our Snowbird Reship customers are noted and given to the appropriate department for their investigation and corrective action. In spite of service delays, customers using Snowbird Reshipments still received mail that cannot be forwarded using CFS and their mail was arriving in a single mail package instead of individually over a period of days.

This can be a great convenience for customers who are traveling or moving around for a seasonal vacation or job. Customers can be assured that we are doing everything we can to pinpoint service problem areas and will take the necessary action to enable us to make our service commitment to our customers.

ATTACHMENT PL 14

Q. My customer complained about not having the opportunity to use “free forwarding.” What can I say?

A. Customers still have the use of the “free forwarding” service provided by the USPS. Nothing has changed. The Snowbird Reship program is an individualized, special service provided for those customers who wish to have all or only some classes of mail reshipped. They do not wish to enter a temporary COA and they prefer the convenience of receiving the Priority reshipment on the same day each week. The option to call ahead to let the postmaster know where to send mail is especially easy and convenient for customers who travel around frequently for work or while vacationing. The service options for customers who are temporarily away from home are a matter of personal preference for the customer.

Q. My customer wants to have me send the mail in a penalty envelope like his former postmaster used to do. Why can't we do that?

A. Customers loved this special service! Many postmasters provided customers with this service as a courtesy and even sometimes to eliminate complaints about newspapers. Official Penalty Mail, as defined in DMM E060 1.0, is official mail sent by U.S. Government agencies, relating solely to the business of the U.S. Government, that is authorized by law to be carried in the mail without prepayment of postage. ***Agencies may not lend or provide penalty envelopes, cards, cartons, labels, meter stamps or penalty mail stamps to any private person, concern, or organization.*** The use of these items for matter not relating exclusively to the business of the U.S. Government is **prohibited**. The postage paid in the Snowbird Reship program covers the costs associated with reshipping the mail and contributes significantly to overall customer satisfaction. **REMEMBER, revenue protection is everyone's responsibility!**

Q. My customer doesn't understand why different classes of mail cannot be forwarded “free”. I'm having trouble explaining.

A. The different classes of mail are handled according to the established regulations utilized by the Centralized Forwarding System. Because of the massive number of Changes of Address filed by customers all across the nation, it is necessary to maintain some hard and fast rules in order to move the mail more expeditiously and efficiently. The Snowbird Reship program is an option available to customers who wish to take advantage of the opportunity to reship all or part of their mail, when and where they need it. The only cost associated with this service is the cost of postage to reship the mail via Priority Service.

Q. My customer objects to paying for Snowbird Reship service. After all, postage has been paid on the mail once and he feels he shouldn't have to pay more postage to get it forwarded.

A. Again, the customer is entitled to the “free” forwarding service provided by CFS. The Snowbird Priority Reship program is optional and not subject to the limitations of the “free” forwarding service. The amount of postage is charged at the Priority rates and is determined by the weight of the items reshipped. There is a charge for postage, but **not** for the special handling we do to reship the mail.

ATTACHMENT P6 15

Q. My customer has friends from other states that did not have to pay for Snowbird Reship service. Why does my customer?

A. In August of 1995, Headquarters issued a directive to all Area Vice Presidents setting forth the requirements for the field to continue offering the Snowbird Reship service using Priority Mail. The directive specifically states that correct postage for reshipping *MUST* always be collected. There has been no change to that policy issued from Headquarters and, until there is something new, all postmasters in the [redacted] must follow these guidelines.

SECTION TWO
SAMPLE FORMS



Dear Valued Customer:

Because we know how important your mail is to you, we are offering a special service to our customers who like to travel to warmer climates, take extended vacations, or travel on business.

In the "**SNOWBIRD RESHIP**" program, your mail is batched and reshipped via Priority Mail to a temporary address for as little as \$3.85 a shipment. All classes of mail can be included in the "reship" service. And, free mailing supplies are provided by your local post office. All that is required is a temporary mailing address and **prepayment** of postage. For those urgent matters, guaranteed overnight or second day Express Mail is available for as little as \$13.65. There is no extra charge for the special handling of your mail; you only pay the appropriate postage rate.

By using this personalized reship service, it is no longer necessary to notify your business or personal correspondents of a temporary change of address. You also eliminate the need to have a friend or family member make that extra trip to pick up and forward your mail. All classes of mail can be reshipped to you in a single package as often as you wish. Even though you may still use our free temporary forwarding service while you travel, we think you might want to try our Snowbird Reship service. It's fast, economical and lets you relax and enjoy your time away from home without worrying about your mail.

If you are going to be away from home for an extended period of time on business or pleasure, why not try the new "SNOWBIRD RESHIP" service from your post office? Please contact our office for more details on how to get started.

Sincerely,

Postmaster

Enclosure – Application Card

ATTACHMENT P6 18

NAME: _____

Zone/House ID # _____
Date Entered on Form 3982 _____
Expiration Date _____
Clerk/Carrier Endorsement _____

Yes, Please Reship my mail to my Temporary Address

Temporary Address

 Phone # _____

My Permanent Address

 Phone # _____

Start Date: _____
End Date: _____

Individual Only
 Family

I wish to Reship my mail via: Express Mail (Overnight or Second Day Service)
 Priority Mail (2-3 day service)

Please Reship

____ FIRST-CLASS Mail
____ Parcel
____ Advertising Mail
____ Periodicals (newspapers/
magazines)

Hold for my return

____ FIRST-CLASS Mail
____ Parcel
____ Advertising Mail
____ Periodicals (newspapers/
magazines)

To be picked up by: _____

(Name)

____ FIRST-CLASS Mail
____ Parcel
____ Advertising Mail
____ Periodicals (newspapers/
magazines)

How often do you want us to reship your mail?

Weekly (MON TUE WED THU FRI)
 Bi-Weekly (2 times a week)
 Other: _____

Signature: _____

Date: _____

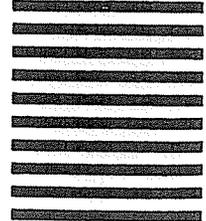


ATTACHMENT P6 19



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. 73026 WASHINGTON DC
POSTAGE WILL BE PAID BY ADDRESSEE



SNOWBIRD RESHIP SERVICE

Dear Valued Customer:

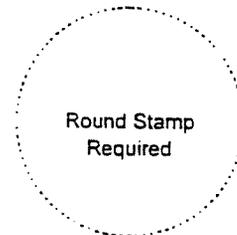
We would appreciate your input so we may determine the service performance of our SNOWBIRD RESHIP Program. Please assist us by filling in the lines below, providing us with your name, city and state of your temporary address, and the date this package was received, then drop this postage-paid card in the nearest mailbox.

Thank you for assisting us in providing the finest postal service possible, the service you expect and deserve.

NAME: _____

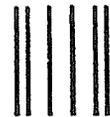
CITY & STATE: _____
(TEMPORARY)

DATE RECEIVED: _____



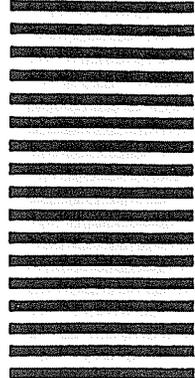
UNITED STATES POSTAL SERVICE SRS 2

ATTACHMENT PG 20



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. 73026 WASHINGTON DC
POSTAGE WILL BE PAID BY ADDRESSEE



SNOWBIRD RESHIP SERVICE

Tell us what you think!
We appreciate your comments and concerns.
Please take a few moments to share your opinions with us.

Please rate your local Post Office on:

	Excellent	Very Good	Good	Fair	Poor
1. Its overall performance in the reshipping of your mail?	<input type="checkbox"/>				
2. Receipt of your reshipped mail?	<input type="checkbox"/>				
3. How would you compare SNOWBIRD reshipment with temporary forwarding service used in the past?	<input type="checkbox"/>				
4. Delivery of reshipped mail to your Correct address?	<input type="checkbox"/>				

Your comments and concerns: _____

Name: _____

Permanent Address: _____ Temporary Address: _____

City/State/ZIP Code: _____ City/State/ZIP Code: _____

ATTACHMENT PG 21

SNOWBIRD RESHIP SERVICE

SNOWBIRD RESHIP SERVICE

NAME _____

ADDRESS _____

CITY/STATE _____ ZIP CODE _____

RESHIP VIA PRIORITY/EXPRESS MAIL

BEGIN _____ END _____



(7 DAYS PRIOR TO RESUME DELIVERY DATE)

ATTACHMENT Pg 23

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-6. From line 9 on page 2 to line 6 on page 3 of your testimony, you indicate the contents of PFS shipments.

- (a) Please confirm that the postal service will NOT process any requests for Address/Return/Change/Forwarding Service Requested etc. endorsements that have been placed on the mail by the original sender of the mail that is being forwarded under the PFS.
- (b) Please confirm that mail which the sender has marked DO NOT FORWARD will still be forwarded by PFS.
- (c) Please confirm that accountable mail referred to in line 12 of page 2 also includes Certified Mail / Registered Mail / Insured Mail / COD Mail / Return Receipt for Merchandise and would also be rerouted immediately to the temporary address.
- (d) Please confirm that mail arriving at the primary address which requires that payment of postage due will also be forwarded in the same manner as accountable mail.
- (e) Please confirm that the words "No additional fee" on line 15 of page 2 means that the accountable mail will be forwarded under the single \$10 fee and will not be charged postage due on arrival (other than the postage due mail referred to in subpart d above).
- (f) Please confirm that all Priority Mail will be forwarded immediately upon receipt under the single \$10 fee and will not be charged postage due on arrival unless it arrives on the date of shipment (normally Wednesday) and it will fit inside the shipment container.
- (g) How will packages and parcels which do not fit inside the PFS shipment container but have been originally shipped as First-Class Mail be treated?
- (h) Please confirm that the words "All pieces" on line 3 of page 3 refers only to the words "Other packages and parcels" on line 1 of page 3 and that this refers only to packages and parcels that were shipped as one of the Package Services (Parcel Post / Media Mail / Library Mail / Bound Printed Matter).
- (i) Please explain any items you are not able to confirm.

RESPONSE:

Answers to some of these questions require careful distinction between 1) the reshipment of PFS packages, and 2) the existing temporary and permanent forwarding options. The proposed product's name readily communicates to customers what happens to their mail should they use the service, but in a more technical sense PFS does not "forward" mail.

(a)-(b) PFS is a proposed reshipment service, and PFS mail, because it is not "undeliverable-as-addressed (UAA)" mail, would not be "forwarded"; this is discussed in

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

my testimony on pages 9-10. As such, mailer endorsements or instructions concerning the treatment of UAA mail are inapplicable to PFS mail.

(c) Certified Mail, Registered Mail, Insured Mail, COD Mail, and Return Receipt for Merchandise, along with all other mail requiring a delivery scan or customer's signature, would be rerouted immediately to the temporary address and not included in the PFS package.

(d) Confirmed.

(e) Confirmed.

(f)–(g) Please refer to Section II.B of my testimony.

(h) Confirmed; "All pieces" on line 3 of page 3 of my testimony refers only to the words "Other packages and parcels" on line 1 of page 3. "Other packages and parcels," however, is not confined simply to Package Services parcels (e.g., there could be a Standard Mail parcel).

(i) N/A.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-7.

- (a) Please confirm, or explain if you are not able to do so, that the only cost that a customer utilizing PFS will incur will be
 - (1) the enrollment fee,
 - (2) the weekly fee,
 - (3) the cost of any mail arriving at the primary address postage due, and
 - (4) the Priority Mail postage rate for packages and parcels that will not fit in the forwarding container and are in a mailing category that may not be forwarded free of charge.
- (b) Is a customer able to opt out of the added cost incurred in item 4 above?
- (c) If not, why not?
- (d) Can a PFS customer refuse an article that has been forwarded to them under the provisions of item 4 above?
- (e) If so, what happens to the article and are there any consequences to the customer relating to PFS?

RESPONSE:

(a) I can confirm that the customer would pay an enrollment fee and the sum of the weekly per-shipment charges, based on the duration of service. A PFS customer could also be asked to pay Priority Mail postage due for parcels that are neither Express Mail nor Priority Mail which are reshipped to the temporary address outside of the PFS package. Pieces arriving postage due at the delivery unit for the primary address would also be reshipped outside of the PFS package. Please refer to Section II.B of my testimony for discussion of customer payments.

(b)–(e) PFS would be an experiment in which simplicity was a primary design goal. Customers would accordingly not be able to opt out of this feature. While customers do have the right to refuse postage due pieces, the Postal Service does not expect this to happen much since customers typically have control over where and how parcels are shipped to them.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-8. On lines 5 and 6 of page 3 of your testimony, you indicate that standardized instructions would be developed to guide the decision whether to include the package in the PFS shipment. Please provide any draft or conceptual ideas that exist as of today.

RESPONSE:

To get an idea of what standardized instructions might include, please refer to Section II of my testimony. This section describes what I envision the service would provide and how it would be conducted and managed. No further definitive instructions exist.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-9. On lines 8 thru 10 of page 3 of your testimony, you state that PFS would be explained to customers who inquire about Temporary Change of Address service. Please explain the methods that the Postal Service will utilize to inform customers of this new service.

RESPONSE:

As stated in my testimony, "Sales and Service Associates (SSAs) and carriers would explain PFS to all customers who inquire about Temporary Change of Address service."

Details beyond what is referenced in my testimony have not been developed.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-10.

- (a) Please confirm, or explain if you are not able to do so, that customers who file a Change of Address order (PS Form 3575) do not have to provide any identification or verification.
- (b) Please explain why it will be necessary for PFS customers to be identified and verified.
- (c) Please advise all of the application processes that occur when a Post Office box is rented and indicate which of these processes would apply for a PFS applicant.

RESPONSE:

(a) Not confirmed. Customers who file hardcopy Change of Address Orders (PS Form 3575) must sign the form. The signature validates the change request. The form indicates:

The person signing this form states that he or she is the person, executor, guardian, authorized officer, or agent of the person for whom mail would be forwarded under this order. Anyone submitting false or inaccurate information on this form is subject to punishment by fine or imprisonment or both under Sections 2, 1001, 1702 and 1708 of Title 18, United States Code.

Customers who file a Change of Address Order electronically through USPS.com have their identity verified using credit card information.

(b) Unlike Permanent and Temporary Change of Address Orders, PFS would be a fee-for-service offering and would involve collecting and dispensing funds (refunds may be appropriate in some cases). Verification of the customer's identity at enrollment is designed to prevent fraud.

(c) Please refer to the DMM sections D910.2.1-2.2

(<http://pe.usps.gov/cpim/ftp/manuals/dmm/D910.pdf>) and POM sections 841.121-122

(<http://www.nalc.org/depart/cau/pdf/manuals/pom/pomc8.pdf>) for P.O. Box application

procedures and Section II.C.i of my testimony. This latter link is not to a Postal Service website, but the content of the cited POM sections is correct (except that POM section

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

841.122a(2) has been changed so that parents or guardians no longer need to list the “age(s)” of each minor on PS Form 1093).

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-11.

- (a) Do you feel that a customer signing up for PFS service for a full year will experience "sticker shock" when presented with a request for \$530?
- (b) If not, why not?

RESPONSE:

I could not say whether any particular customer would or would not experience "sticker shock" at any particular price. In any event customers would be aware of the price of PFS before signing up, and would presumably weigh their options when determining whether to use PFS.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

- DBP/USPS-T1-12.** If a PFS customer's needs change after signing up for the service,
- (a) can they add additional time to the current application?
 - (b) If so, will they only pay the \$10 per week fee or is there a new enrollment fee?
 - (c) Can they terminate the service early?
 - (d) If so, can they receive a refund of the \$10 per week fee for the weeks not utilized?
 - (e) Can they suspend the service for one or more weeks during the total enrollment period?
 - (f) If so, can they receive a refund of the \$10 per week fee for the weeks not utilized?

RESPONSE:

(a)–(b) A customer could conceivably extend the duration of service, but not beyond twelve months from the initial start date. Extensions would not require a new enrollment fee, but the per-shipment charges for the additional weeks would have to be paid in advance.

(c)–(d) Yes, if a customer's temporary relocation terminates early, a refund would be available.

(e)–(f) Suspension of service would not be allowed. However, such a customer could terminate the initial service period and re-enroll.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-13.

- (a) Can customers sign up for PFS on a single application for weeks that are not consecutive?
- (b) If not, why not?

RESPONSE:

No, this would not be permitted. PFS is an experiment in which simplicity was a primary design goal, and allowing this would add unnecessary complexity to the product design.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-14. Can customers sign up for PFS starting at a time which is later than the Wednesday following the date of signing up?

RESPONSE:

If your question is how far in advance a customer could sign-up for PFS prior to the reshipment start date, I do envision customers having the ability to enroll in advance.

How far in advance has not been determined.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-15. What procedure will be followed if a Wednesday is a holiday?

RESPONSE:

Standard Operating Procedures to address this situation have not been developed.

However, it would be fair to expect that if a reshipment did not go out on the Wednesday, it would do so shortly beforehand or thereafter.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-16.

- (a) Please provide a copy of the sample label that would be utilized for the PFS container.
- (b) Will the date of mailing appear on the container, either on the label or by means of a postmark?

RESPONSE:

- (a) A sample has not been developed.
- (b) The date of shipment would appear on the container either directly or on the label.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-17. Please provide the specifics of the term "individuals who receive their mail at a central delivery point" as noted on line 14 of page 6 of your testimony. Please provide examples.

RESPONSE:

Central delivery points receive mail in bulk and are responsible for any further sortation and distribution. Examples include schools, hotels, businesses, apartment complexes, and prisons. Please refer to DMM sections D042.3.0 – 6.0

(<http://pe.usps.gov/cpim/ftp/manuals/dmm/D042.pdf>) and F020.1.4

(<http://pe.usps.gov/cpim/ftp/manuals/dmm/F020.pdf>) for further explanation of mail addressed to individuals at a business location.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-18. On line 18 of page 6 of your testimony, you indicate that PFS is designed for household customers.

- (a) Is the service available under any conditions to a customer classified as a business?
- (b) Provide examples of those customers who would be eligible to utilize PFS vs. those that would not be eligible.
- (c) What happens to mail that arrives at a residence addressed to a "home office" business operated by the resident?

RESPONSE:

(a)–(c) Customers who meet the eligibility requirements presented in Section II.C.iv of my testimony would be eligible to use PFS. That section notes that customers who receive their mail at certain delivery points, such as central delivery points and Post Office boxes of certain sizes, would be ineligible for PFS. Similarly, customers who utilize caller service or firm holdout service would be ineligible for PFS. Hence, some delivery customers operating a small business from their households could become PFS customers.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-19.

- (a) If a PFS shipment is not made as "required" on a given Wednesday or whatever arrangements will be performed when Wednesday is a holiday, is the customer entitled to a refund of the weekly fee?
- (b) If not, why not?

RESPONSE:

(a)–(b) Wednesday is designated as the shipment date for operational simplicity and standardization. The weekly per-shipment charge is based on one shipment a week.

As long as one shipment goes out each week, the Postal Service has met its obligation to the customer. See also the response to DBP/USPS-T1-15.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-20. If a customer signs up for PFS for a given time period and the rates for either PFS or for Priority Mail change, will they be required to pay the additional fee for the outstanding weeks?

RESPONSE:

It is conceivable that existing customers would be allowed to continue receiving their service at the initial rate if, when they sign up and pay for PFS, no change in rates had been directed by the Board of Governors. No policy concerning this issue has been established.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-21.

- (a) Are PFS shipments processed as any other Priority Mail piece with respect to all conditions including forwarding?
- (b) If not, please explain any differences.
- (c) What return address will appear on a PFS container?
- (d) What will happen if a PFS container is returned to the sender?

RESPONSE:

(a)-(b) Yes.

(c)-(d) The return address on the PFS container would always be the reshipping post office and all returns would go back to that address. Specific procedures for this unlikely occurrence, if warranted, have not been developed.