

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

EXPERIMENTAL PREMIUM
FORWARDING SERVICE

Docket No. MC2005-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
WITNESS ABDULKADIR M. ABDIRAHMAN
TO INTERROGATORIES OF DAVID B. POPKIN
(DBP/USPS-T3-2-4[c])
(December 8, 2004)

The United States Postal Service hereby provides its responses to the following interrogatories of David B. Popkin: DBP/USPS-T3-2-4[c], filed on November 24, 2004. Interrogatories DBP/USPS-T3-1 and DBP/USPS-T3-4[a] were redirected to witness Cobb (USPS-T1). Responses to interrogatories DBP/USPS-T3-4[d]-6 will be filed shortly.

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 ABDIRAHMAN
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T3-2. On lines 3 to 6 on page 3 of your testimony, you indicate that the collection process would be similar to the collection of postage due at a call window. Please provide each of the elements that are involved in the collection of postage due and indicate which of these items would be incurred in the PFS program.

RESPONSE:

The elements involved in the collection of postage due at a call window are an explanation from the clerk to the customer regarding the postage due, payment by the customer, and release of the mailpiece by the clerk. The elements involved in the PFS collection process would be similar to these. Therefore, I determined that collection of postage due was a reasonable proxy for this experiment.

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

DBP/USPS-T3-3. On lines 10 to 12 on page 3 of your testimony, you indicate that the recordation process would be similar to the processing of a Change-of-Address card. Please provide each of the elements that are involved in the processing of a Change-of-Address card and indicate which of these items would be incurred in the PFS program.

RESPONSE:

When processing a Change-of-Address card, the employee must enter the customer's name, previous address, new address, and effective start date for the new address, and end date for the forwarding service. The recordation process for the PFS Master Log would involve the entry of similar information, such as the customer's name, primary address, PFS address, effective start date and end date. Therefore, I used Change-of-Address processing as a reasonable proxy for this experiment.

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

DBP/USPS-T3-4. On lines 19 and 20 of page 4 of your testimony, you indicate that the Postal Service would provide and complete the necessary PFS address labels. [a] What arrangements will exist to supply the local office with labels for the PFS customers? [b] Will the local carrier be required to take any action other than affixing a preprinted label? [c] If so, please enumerate the items that have to be completed by the local carrier. [d] Please advise how the 1 minute time was determined for filling out the label and how this was converted to a cost of \$0.76.

RESPONSE:

[a] Redirected to witness Cobb (USPS-T-1).

[b] Regarding carrier actions specific to labels, in offices that are able to generate preprinted labels, the carrier would simply have to affix the label. In offices that are not yet able to generate preprinted labels, the carrier will be required to prepare each label for PFS related mailings. We currently do not know the percentage of offices that are able to generate preprinted labels. Therefore, in order to be conservative, I assumed in my cost study that carriers would be preparing each label manually.

[c] In offices that are not yet able to generate preprinted labels, the local carrier would be required to fill out the temporary address for the PFS customer.

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.

Kenneth N. Hollies

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December 8, 2004