

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Experimental Premium Forwarding Service )

Docket No. MC2005-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS ARNETTA L. COBB (OCA/USPS-T1-14-22)  
December 9, 2004

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Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-13 dated November 29, 2004, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T1-14. Please refer to your testimony at page 3, lines 8-9. Please confirm that Sales and Service Associates will be window clerks. If you do not confirm, please explain.

OCA/USPS-T1-15. Please refer to your testimony at page 3, lines 12-13, where you state "Customers must complete and sign a four-part hardcopy PFS application." Please provide a copy of the four-part PFS application.

OCA/USPS-T1-16. Please refer to your testimony at page 3, lines 12-13. Please confirm that customers must complete and/or submit the application for PFS at the delivery unit serving the customer's primary address. If you do not confirm, please explain.

OCA/USPS-T1-17. Please refer to your testimony and page 3, lines 16-17, which states that the customer must identify the "Primary address from which mail would be reshipped," and the "Temporary address to which PFS shipments would be sent." At page 4, lines 10-13, you note the SSAs would review the application. Would the clerk receiving the PFS application verify the accuracy of the primary address and the temporary address in "real time," i.e., in the presence of the customer making the application? Please explain what methods would be used to verify the accuracy of primary address and the temporary address.

OCA/USPS-T1-18. Please refer to your testimony at page 4, lines 14-15, where it states "SSAs would also question each customer ordering PFS to ensure that the customer has no active forwarding order (PS Form 3575) in effect."

- a. In general, do post offices (i.e., delivery units) have and maintain an updated list of customers with active change-of-address orders? Please explain.

- b. For post offices that have provided customers with reshipping arrangements conceptually similar to PFS, do such offices have and maintain an updated list of customers with active change-of-address orders? Please explain.
- c. What methods, other than questioning the customer, will the SSA use to independently verify that a customer does not have an active change-of-address order? Please explain.

OCA/USPS-T1-19. Please refer to your testimony at page 5, lines 7-10.

- a. Please provide a blank copy with headings of a PFS coordinator's Master Log of PFS customers.
- b. Is the Master Log of PFS customers expected to be maintained and updated via computer? Please explain.

OCA/USPS-T1-20. Please refer to your testimony at page 5, lines 14-15, where it states, "The carrier or box clerk would review his or her records to verify that the PFS applicant has no active temporary or permanent Change of Address on file."

- a. Please confirm that carrier and box clerk would not verify whether the PFS customer has an active temporary or permanent Change of Address order on file in "real time," i.e., in the presence of the customer making the application. If you do not confirm, please explain.
- b. Please explain how the Postal Service will process a PFS application and customer's payment where the carrier and box clerk determine after an application has been submitted that the PFS customer has an active temporary or permanent Change of Address order on file.

OCA/USPS-T3-21. Please refer to your testimony at pages 5 and 6, lines 21 and 1, respectively.

- a. Please identify the postal employee that would enter the names and addresses displayed on the machine-printed labels.
- b. Please explain at what postal office or facility the names and addresses would be entered that are displayed on the machine-printed labels.
- c. Please identify at what postal office or facility the machine-printed labels would be generated.
- d. Please explain how the Postal Service will assure the accuracy of the names and addresses displayed on the machine-printed labels.

OCA/USPS-T1-22. Please refer to your testimony at page 2, lines 12-15.

- a. Please identify all accountable mail and all mail requiring a scan upon delivery that “would not be held for shipment within the PFS package.”
- b. Please explain how “such mail would be rerouted immediately to the temporary address.” Specifically: Is a reshipping label applied to the accountable mail and mail requiring a scan? Will the scan be effectuated at the temporary address? How will accountable mail be handled?