

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

EXPERIMENTAL PREMIUM
FORWARDING SERVICE

Docket No. MC2005-1

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

The United States Postal Service hereby files the responses of witness Arnetta L. Cobb to the following interrogatories of the Office of the Consumer Advocate (OCA): OCA/USPS-T1-14-22, filed on December 9, 2004. Please note that the OCA incorrectly labeled OCA/USPS-T1-21 as being directed to the T-3 witness in this proceeding; the Postal Service, after discussing the issue with the OCA, has provided the correct labeling in its response.

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 OCA INTERROGATORY

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.

RESPONSE:

The current job title for a window clerk is "Sales and Service Associate."

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO OCA INTERROGATORY

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.

RESPONSE:

While the Postal Service is considering what information would be necessary for a PFS application, an actual application form has not been developed. The data elements identified in the six bullets on page 3 of my testimony, plus the need for a four-part form, reflect our current understanding of what is necessary.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO OCA INTERROGATORY

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.

RESPONSE:

The current expectation is that PFS applications would be accepted at any facility under the same administrative supervision of the post office responsible for delivering mail to a customer's primary address. Thus, the delivery unit serving that address would usually be an option (if it has a retail window), as would the main office and its stations or branches.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO OCA INTERROGATORY

OCA/USPS-T1-17. Please refer to your testimony and [sic] 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.

RESPONSE:

The SSA would ensure that there is no discrepancy between the address on the personal identification presented by the customer and the primary address on the PFS application. The SSA would also confirm that the temporary address on the application is where the customer wants the mail reshipped, and would make sure all addresses are legible.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO OCA INTERROGATORY

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.

RESPONSE:

(a)-(b) Post offices do maintain an updated record of active change of address orders, although not usually in list form. Each carrier and box clerk keeps a record of address changes in his or her area.

(c) Our plan is to have the SSA simply verify orally, at the time of application, that an active change of address order is not on file. The box section clerk or carrier serving the customer’s primary address would later verify this.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO OCA INTERROGATORY

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.

RESPONSE:

(a) While the Postal Service is considering what information would be necessary for the Master Log, a finalized form has not been developed. As the cited portions of my testimony indicate, however, the Master Log would contain a PFS customer's basic reshipping information.

(b) The actual appearance of the Master Log could vary depending on the office's technological capabilities. In offices with a computer, I envision the Master Log being in a Word or Excel document format; therefore, it could be replicated, maintained, and updated using a computer.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO OCA INTERROGATORY

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.

RESPONSE:

(a) Confirmed.

(b) A situation where simultaneous PFS and forwarding orders are in effect for a PFS customer would certainly be unusual, since customers are presumably aware of when they submit a Change of Address order, and have no reason to give conflicting orders on the delivery of their mail. Specific procedures for this unlikely occurrence, if warranted, have not been developed.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO OCA INTERROGATORY

OCA/USPS-T1-21. 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.

RESPONSE:

(a) The employee may vary depending on the office, but my expectation is that it would usually be a clerk.

(b)-(c) The machine-printed labels would be generated, and the names and addresses entered, at the post office handling PFS for the customer or at its District Consumer Affairs Office.

(d) The person preparing the labels would check the customer's name and address on the label against the customer application or the Master Log.

RESPONSE OF POSTAL SERVICE WITNESS COBB
TO OCA INTERROGATORY

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?

RESPONSE:

(a) During the development of the PFS proposal, we determined that mail that requires the scan of a barcode and/or a signature upon delivery, which includes mail commonly understood as being accountable mail, would not be delayed for or included in PFS packages. Mail requiring a scan includes Express Mail, Numbered Insurance, Certified Mail, Registered Mail, Collect on Delivery (COD), Signature Confirmation, Delivery Confirmation, and Return Receipt. Postage Due Mail would also be rerouted immediately to the temporary address.

(b) In most cases, I do not envision attaching a reshipping label to these pieces because some accountable pieces have carbonless address labels that require pressure when completing the label to ensure the address is on all copies. The carrier would instead line through the permanent address and write in the temporary address, and then reenter the piece into the mail stream immediately. Operationally, all mail requiring a scan at delivery would be handled as though a forwarding order were in effect: the mail would receive a “forwarded” scan at the delivery unit for the primary address and a “delivered” scan (or one or more other scans, including attempted delivery) upon its arrival at the temporary address. Thus, the final scan would be effectuated at delivery to the temporary address.