

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 DAVID B. POPKIN
(DBP/USPS-T1-22-24, 26-37)
(December 30, 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-T1-22-24, 26-37, filed on December 16, 2004. Interrogatory DBP/USPS-T1-25 was redirected to the Postal Service.

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-T1-22. Please refer to your response to DBP/USPS-T1-2 subparts b-e. Please provide a definition of the word parcel as noted in line 3.

RESPONSE:

I use the word "parcel" in a general sense, as most people familiar with mail piece shapes would, to refer to a package, box, or a large mail piece that is not a letter or flat. A parcel is generally thicker than flat- or letter-shaped mail pieces.

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

DBP/USPS-T1-23. Please refer to your response to DBP/USPS-T1-2 subparts b-e. The last sentence appears to contemplate that PFS might be removed from a customer after it had been started. Is that the intention? If so, please advise the conditions under which that would take place and whether a refund [of] the enrollment fee and/or weekly fee would be made.

RESPONSE:

The last sentence of my response to DBP/USPS-T1-2(b)-(e) simply states that Postal Service officials, when faced with a situation in which two or more containers are consistently necessary for a particular customer, might consider checking that the customer meets the eligibility requirements for PFS. That was all I intended to convey in my response. The Postal Service designed PFS as a service for residential households, and accordingly does not expect this situation to arise. However, if it does arise and that customer is eligible for the service, the Postal Service would be obligated to continue the service.

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

DBP/USPS-T1-24. Please refer to your response to DBP/USPS-T1-5 subpart a.

- (a) Please advise the district offices that provided the attachments.
- (b) It would appear that information was redacted from the attachments although this was not mentioned in your response. Please advise why the information was redacted since in [sic] would appear that these attachments appear to have been sent to members of the public.
- (c) Please explain why you did not make use of information that was utilized in the field.

RESPONSE:

(a) The attachments were provided by the Central Plains and Albany Districts.

(b) Only some of the documents attached were designed to be distributed publicly. As my response to DBP/USPS-T1-5(a) states, my purpose in providing the documents was simply to illustrate how informal reshipping arrangements have operated. My attorney advises me that the Postal Service avoids providing office-specific information in Commission proceedings; since the purpose for which the documents were provided was not affected by the redactions, we did not previously mention them. In addition to district names (which I have now provided in response to part (a) after a determination that, in this instance, there is no need to avoid identifying the districts), the redacted information included office-specific names, addresses, and telephone numbers, plus the names of postal officials.

(c) As page 7 of my testimony and my response to DBP/USPS-T1-5(a) indicates, I did make use of information from the field in developing the PFS proposal.

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

DBP/USPS-T1-25. Please refer to your response to DBP/USPS-T1-5 subparts d-e. By regulatory authority I was referring to sections of the DMM and/or POM or other postal directives. Please respond or refer my interrogatory to an individual who can respond to the original interrogatory.

RESPONSE:

Redirected to the Postal Service.

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

DBP/USPS-T1-26. Please refer to your response to DBP/USPS-T1-6 subpart g. Please advise the specific page and line of Section II.B of your testimony that describes how packages and parcels originally shipped as First-Class Mail will be treated. Will they be forwarded as First-Class Mail free of charge or will they be forwarded via Priority Mail postage due or by some other means?

RESPONSE:

My response to DBP/USPS-T1-6(g) fully answers the question, since the entirety of Section II.B of my testimony is necessary for a complete response. Moreover, please note, as stated in my response to DBP/USPS-T1-6 and my testimony at pages 9-10, any parcel handled in connection with PFS would, technically, be reshipped rather than forwarded.

Section II.B of my testimony contains three paragraphs. The first paragraph, consisting of lines 10-16 on page 2, focuses upon mail that requires a scan at delivery. A First-Class Mail parcel that requires a scan at delivery would accordingly be handled as described in that paragraph. The second paragraph, consisting of lines 17-22 on page 2, focuses upon Priority Mail parcels that do not require a scan upon delivery. A First-Class Mail parcel sent as Priority Mail that does not require a scan upon delivery would accordingly be handled as described in that paragraph. The third paragraph, consisting of lines 1-6 on page 3, focuses upon “[o]ther packages and parcels,” which from the structure of the section are implicitly not Priority Mail, and do not require a scan at delivery. Such First-Class Mail parcels would accordingly be handled as specified in that paragraph; if such a parcel is not included in the PFS shipment (which should be an unlikely occurrence), it would be reshipped at the Priority Mail rate, postage due.

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

DBP/USPS-T1-27.

- (a) Please advise the criteria that will be utilized to evaluate a given piece of mail as a package or parcel which will be shipped as a separate piece of mail sent by Priority Mail postage due.
- (b) Will the weight of the article be considered in making that determination?
- (c) If so, what will the criteria be?
- (d) Will any or all of the three dimensions of the article be considered in making that determination?
- (e) If so, what will the criteria be?

RESPONSE:

(a)-(e) As noted in my response to DBP/USPS-T1-8, standardized instructions that would guide decisions about whether to include a package in the PFS shipment have not been developed. However, use of the word “guide” in my testimony was intentional because it seems unlikely that detailed instructions would be either necessary or appropriate. Packaging decisions would need to be guided by criteria such as the weight, volume, shape, and dimensions of the mail being reshipped in conjunction with available containers. Postal Service employees are experienced in how these criteria impact mail processing, and could accordingly be depended upon to make educated packaging decisions. Thus, the standardized instructions would provide broad-based guidance that allows employees to make such educated decisions, together with an indicated expectation that most parcels would fit into the PFS package.

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

DBP/USPS-T1-28. Please refer to your response to DBP/USPS-T1-7 subpart e. Your response appears to not respond to my original interrogatory other than to state that it is not expected to happen much. Please respond to the original interrogatory for those instances where it does happen.

RESPONSE:

In my response to DBP/USPS-T1-7, I noted that customers would “have the right to refuse postage due pieces.” I believe my answer was responsive to your interrogatory because it clearly implies that there would be no adverse consequences imposed by the Postal Service on PFS customers who refuse a postage due piece. Please refer to DMM section D042.1.2 (<http://pe.usps.gov/cpim/ftp/manuals/dmm/D042.pdf>), which notes that an addressee has the right to refuse to accept a mailpiece when it is offered for delivery. DMM section F010.1.0 (<http://pe.usps.gov/cpim/ftp/manuals/dmm/F010.pdf>) notes that mail that is refused is processed as Undeliverable-As-Addressed (UAA).

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

DBP/USPS-T1-29. Please refer to your response to DBP/USPS-T1-8. Please advise the specific page and line of Section II of your testimony that provides the idea of what standardized instructions might include.

RESPONSE:

The entirety of Section II of my testimony, which starts on line 8 of page 1 and ends on line 2 of page 7, is responsive to your question regarding what would and what would not be included in PFS shipments. As I indicated in my response to DBP/USPS-T1-8, the standardized instructions have yet to be developed, and Section II of my testimony provides the best available information regarding what may be put into those instructions. Section II.A addresses generally the relationship between mail delivered to a single delivery point and what portion of that mail would be in the PFS package. Section II.B provides additional details regarding what would be in a PFS package; my response to DBP/USPS-T1-26 is also applicable here. Finally, Section II.C describes how PFS would operate, which could influence the content of the standardized instructions regarding whether to include a package in the PFS shipment.

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

DBP/USPS-T1-30. Please refer to your response to DBP/USPS-T1-10 subpart a. Please confirm, or explain if you are not able to do so, that when a customer submits a Change of Address order (PS Form 3575) they do not have to provide any identification.

RESPONSE:

This question was answered in my earlier response to DBP/USPS-T1-10(a). A customer who submits a hardcopy Change of Address form need not provide any documentation of identity, though they must sign the form. Customers who submit a Change of Address order through USPS.com need not provide any documentation of identity, though they have their identity verified using credit card information.

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

DBP/USPS-T1-31. Please confirm, or explain if you are not able to do so, that it would appear that a dishonest person would be more likely to file a fraudulent Change of Address order than a request for PFS where they would have to pay money for the service.

RESPONSE:

I could not say whether a “dishonest person” would or would not be more likely to file a fraudulent Change of Address Order than a PFS application.

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

DBP/USPS-T1-32. Please refer to your response to DBP/USPS-T1-10 subpart b. Please confirm, or explain if you are not able to do so, that if a refund had to be made to a PFS customer it would be made out to their order and mailed to their address of record.

RESPONSE:

My expectation is that most refunds would be made in person at the window after the PFS customer returns to the primary address, given to the customer with the mail that is held between the last reshipment date and the customer's return, or credited to the debit card or credit card used to purchase the service. Providing a refund through a money order mailed to a PFS customer is also conceivable.

RESPONSE OF POSTAL SERVICE WITNESS COBB
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DBP/USPS-T1-33. Please refer to your response to DBP/USPS-T1-10 subpart c. Please confirm, or explain if you are not able to do so, that the Postal Service will be conducting and performing each and every one of the processes listed in the two DMM sections and two POM sections in processing a PFS application.

RESPONSE:

The DMM and POM sections cited in my response to DBP/USPS-T1-10 specify the following processes for applying for Post Office box service: the customer completes the Post Office box application and presents it along with two forms of valid, current identification; the employee accepting the application verifies the application; the employee dates the application; the application is forwarded to the facility where Post Office box service is desired if the application is submitted at another facility; and the post office approves or rejects the application.

Similarly, a PFS customer would complete the PFS application and present it along with two forms of valid, current identification; the employee accepting the application would verify the application; the employee would date the application; the application would be forwarded to the appropriate delivery unit when the application is properly submitted at another facility (please see my response to OCA/USPS-T1-16); and the post office would accept or reject the application.

RESPONSE OF POSTAL SERVICE WITNESS COBB
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DBP/USPS-T1-34. Please refer to your response to DBP/USPS-T1-14. Please advise what criteria will be considered in making a decision as to how far in advance a customer may enroll.

RESPONSE:

The Postal Service would consider criteria such as operational feasibility and customer interest.

RESPONSE OF POSTAL SERVICE WITNESS COBB
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DBP/USPS-T1-35.

- (a) May a customer enroll and/or terminate early and/or extend the service in PFS by mail?
- (b) May a customer enroll and/or terminate early and/or extend the service in PFS by visiting a post office other than the office that will be performing the service?

RESPONSE:

(a) While I can state that a customer could not enroll in PFS by mail, specific procedures concerning the exact means by which terminations or extensions could, or could not, occur have not been developed.

(b) Please refer to my response to OCA/USPS-T1-16 regarding enrollment at a post office other than the office that will be performing the service. As for the remaining portions of your question, please see my response to part (a).

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TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-36. Please refer to your response to DBP/USPS-T1-18. Please provide a more specific definition, including specific examples, of the term "central delivery points" as used on line 3 of your response.

RESPONSE:

Please refer to my response to DBP/USPS-T1-17.

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DBP/USPS-T1-37. Please refer to your response to DBP/USPS-T1-19. Please advise why a customer will be unable to receive a refund if the weekly PFS shipment is made on a day other than the "required" day.

RESPONSE:

As I note in my responses to DBP/USPS-T1-19 and OCA/USPS-T1-8, Wednesday was chosen as the shipment date for reasons of operational simplicity and standardization. It would not be a guaranteed day of shipment; instead, PFS would be based on one shipment a week, and so long as one shipment a week is sent the Postal Service would have fulfilled its obligation to the PFS customer.