

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

EXPERIMENTAL PREMIUM
FORWARDING SERVICE

Docket No. MC2005-1

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS ARNETTA L. COBB
TO INTERROGATORY OF DAVID B. POPKIN [Errata]
(DBP/USPS-T1-27)
(January 7, 2005)

The United States Postal Service hereby provides the revised response of witness Arnetta L. Cobb to interrogatory DBP/USPS-T1-27, filed by David B. Popkin on December 16, 2004. The last sentence of the original response to this interrogatory, filed on December 30, 2004, indicated an expectation that “most parcels would fit into the PFS package.” It was inappropriate for the response to assert such an expectation. For example, as noted in witness Koroma’s testimony at page 7, revised January 7, 2005, and at page 2 of Attachment C, added January 7, 2005, Package Services mail would generally be excluded from the PFS shipment, as would virtually all Expedited Mail (Express Mail and Priority Mail). The revised response therefore deletes the last part of the final sentence in the original response.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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RESPONSE TO 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.