

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

EXPERIMENTAL PREMIUM
FORWARDING SERVICE

Docket No. MC2005-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS ARNETTA L. COBB TO INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T1-32)
(January 10, 2005)

The United States Postal Service hereby files the response of witness Arnetta L. Cobb to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T1-32, filed on December 20, 2004. Please note that other interrogatory responses of witness Cobb are inconsistent with this response, and that appropriate errata will be filed over the coming days.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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TO OCA INTERROGATORY

OCA/USPS-T1-32. Please refer to your testimony at page 2, lines 12–16.

- (a) Please confirm that accountable mail also includes Registered Mail; Insured Mail over \$50; Certified Mail; and Return Receipt Requested Mail. If you do not confirm, explain why not.
- (b) Please confirm that, as part of the Premium Forwarding Service (PFS), the following types of “large” packages and parcels would be rerouted immediately, and separately, to the customer’s temporary address without an “additional fee” and without a postage due charge:
 - 1. Package Service with Delivery Confirmation
 - 2. Package Service with Signature Confirmation
 - 3. Package Service (merchandise) with Return Receipt
 - 4. Package Service with insurance over \$50
 - 5. Standard Mail with Delivery Confirmation
 - 6. Standard Mail (merchandise) with Return Receipt
 - 7. Standard Mail with bulk insurance over \$50
 - 8. First Class with Delivery Confirmation
 - 9. First Class with Signature Confirmation
 - 10. First Class with Certified Mail
 - 11. First Class with Return Receipt Requested
 - 12. First Class with insurance over \$50
 - 13. First Class with Registered Mail
- (c) If you do not confirm any part of b., please explain.
- (d) Please refer to the list of package types in part b. of this interrogatory.
 - i. What class of mail would be used to send Package Service accountable pieces from the permanent delivery office to the temporary address?
 - ii. What class of mail would be used to send Standard Mail accountable pieces from the permanent delivery office to the temporary address?
 - iii. What class of mail would be used to send First-Class accountable pieces from the permanent delivery office to the temporary address?
- (e) Please confirm that, under PFS, any size Priority Mail piece, whether it fits into the weekly Priority Mail container or not will be rerouted immediately as Priority Mail to the temporary address and that no additional fee or postage due will be assessed. Also confirm that the only exception to this statement is that Priority Mail pieces that do fit into the weekly Priority Mail container will be placed in the container so long as the piece will not be delayed by that action. If you do not confirm either of the questions in this part, please explain.
- (f) Please confirm that, under PFS, any size Express Mail piece, whether it fits into the weekly Priority Mail container or not, will be rerouted immediately as Express Mail to the temporary address and that no additional fee or postage due will be assessed. Also confirm that the only exception to this statement is that Express Mail pieces that do fit into the weekly Priority Mail container will be placed in the container so

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long as the piece will not be delayed by that action. If you do not confirm either of the questions in this part, please explain.

RESPONSE:

(a) Confirmed.

(b)-(c) Not confirmed. While each of the thirteen subparts would be promptly rerouted to the temporary address outside of the PFS package because each involves the delivery of mail requiring a scan at delivery, subparts 1-7 would be subject to Priority Mail postage due reshipment. Please see the attached table, which provides a succinct summary of how mail would be processed under PFS based on class, shape, and whether a scan is required. The table shows that all parcels that require a scan at delivery would be subject to Priority Mail postage due reshipment unless they are Express Mail, Priority Mail, or First-Class Mail.

(d) (i)-(ii) Priority Mail would be used to reship Package Services and Standard Mail parcels that require a scan at delivery.

(iii) First-Class Mail would be used to reship a First-Class Mail parcel that requires a scan at delivery.

(e) Priority Mail pieces would be immediately rerouted to the temporary address, with no additional postage necessary, unless including them in the PFS shipment would not delay their delivery to the temporary address (as discussed in my response to OCA/USPS-T1-4).

(f) Express Mail pieces would be immediately rerouted to the temporary address as Express Mail, with no postage due. Express Mail pieces would not be included in the PFS package.

DISPOSITION OF MAIL AT OFFICE SERVING PRIMARY ADDRESS FOR PFS CUSTOMER

SHAPE: w/ or w/o SCAN	FIRST-CLASS MAIL	PRIORITY MAIL	EXPRESS MAIL	PERIODICALS	PACKAGE SERVICES	STANDARD MAIL
LETTER	Y	M-O ²	O	Y	—	Y
LETTER w/ SCAN	O	O	O	—	—	—
FLAT	Y	M-O ²	O	Y	—	Y
FLAT w/ SCAN	O	O	O	—	—	—
PARCEL	M-O ¹	M-O ²	O	—	M-PD	M-PD
PARCEL w/ SCAN	O	O	O	—	PD	PD

LEGEND:

Y = YES, included in PFS package.

O = Reshipped OUTSIDE PFS package; no additional postage or fees required.

PD = Piece sent outside PFS package POSTAGE DUE Priority Mail.

M = MAYBE, included in PFS package if it fits.

M-O = If not included in PFS package, reshipped OUTSIDE with no additional postage or fees required.

M-PD = If not included in PFS package, reshipped POSTAGE DUE Priority Mail.

— = Not Applicable (does not occur).

¹ First-Class Mail parcels are likely to fit in PFS packages because of their 13 ounce maximum weight limit.

² Priority Mail pieces are unlikely to be included in PFS packages because inclusion would usually delay the Priority Mail piece's arrival at a PFS customer's temporary address.

Postage Due Pieces Found at Office Serving Primary Address

Any pieces arriving postage due at the office serving a PFS customer's primary address would be handled in conformity with Domestic Mail Manual P011.1.0 Such pieces would not be included in PFS packages, since that would effectively preclude payment of postage due by the PFS customer at a temporary address; however, such pieces could accrue additional postage due charges depending upon the combination of shape, need for a scan, and choice of mail service as reflected in the table above.