

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-T1-6)
(January 12, 2005)

The United States Postal Service hereby provides the revised response of witness Arnetta L. Cobb to interrogatory DBP/USPS-T1-6, filed by David B. Popkin on November 24, 2004. The original response to subpart (e) of this interrogatory, filed on December 8, 2004, was overbroad because it intimated that all mail requiring a scan would be reshipped without being charged Priority Mail postage due. As witness Cobb's response to OCA/USPS-T1-32 (filed on January 10, 2005) indicates, however, Standard Mail and Package Services parcels that require a scan would be reshipped Priority Mail postage due. The revised response provides this correct response.

Also, please note that Section II.B of witness Cobb's testimony has been revised (through errata filed on January 12, 2005) in a way that clarifies the issue of how specific mail pieces would be handled under Premium Forwarding Service (PFS). This revision has implications for subpart (h) of this interrogatory, which queried witness Cobb about the meaning of words that have now been removed

from her testimony. The original response to subpart (h) has therefore been replaced with a response that indicates that the testimony has been revised.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Kenneth N. Hollies
Keith E. Weidner

475 L'Enfant Plaza West, SW
Washington, DC 20260-1137
(202) 268-3083; Fax -3084

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

DBP/USPS-T1-6. From line 9 on page 2 to line 6 on page 3 of your testimony, you indicate the contents of PFS shipments.

- (a) Please confirm that the postal service will NOT process any requests for Address/Return/Change/Forwarding Service Requested etc. endorsements that have been placed on the mail by the original sender of the mail that is being forwarded under the PFS.
- (b) Please confirm that mail which the sender has marked DO NOT FORWARD will still be forwarded by PFS.
- (c) Please confirm that accountable mail referred to in line 12 of page 2 also includes Certified Mail / Registered Mail / Insured Mail / COD Mail / Return Receipt for Merchandise and would also be rerouted immediately to the temporary address.
- (d) Please confirm that mail arriving at the primary address which requires that payment of postage due will also be forwarded in the same manner as accountable mail.
- (e) Please confirm that the words "No additional fee" on line 15 of page 2 means that the accountable mail will be forwarded under the single \$10 fee and will not be charged postage due on arrival (other than the postage due mail referred to in subpart d above).
- (f) Please confirm that all Priority Mail will be forwarded immediately upon receipt under the single \$10 fee and will not be charged postage due on arrival unless it arrives on the date of shipment (normally Wednesday) and it will fit inside the shipment container.
- (g) How will packages and parcels which do not fit inside the PFS shipment container but have been originally shipped as First-Class Mail be treated?
- (h) Please confirm that the words "All pieces" on line 3 of page 3 refers only to the words "Other packages and parcels" on line 1 of page 3 and that this refers only to packages and parcels that were shipped as one of the Package Services (Parcel Post / Media Mail / Library Mail / Bound Printed Matter).
- (i) Please explain any items you are not able to confirm.

RESPONSE:

Answers to some of these questions require careful distinction between 1) the reshipment of PFS packages, and 2) the existing temporary and permanent forwarding options. The proposed product's name readily communicates to customers what happens to their mail should they use the service, but in a more technical sense PFS does not "forward" mail.

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

(a)-(b) PFS is a proposed reshipment service, and PFS mail, because it is not “undeliverable-as-addressed (UAA)” mail, would not be “forwarded”; this is discussed in my testimony on pages 9-10. As such, mailer endorsements or instructions concerning the treatment of UAA mail are inapplicable to PFS mail.

(c) Certified Mail, Registered Mail, Insured Mail, COD Mail, and Return Receipt for Merchandise, along with all other mail requiring a delivery scan or customer’s signature, would be rerouted immediately to the temporary address and not included in the PFS package.

(d) Confirmed.

(e) Not confirmed. Please see the Attachment to my response to OCA/USPS-T1-32, which notes that Standard Mail and Package Services parcels that require a scan would be reshipped Priority Mail postage due.

(f)-(g) Please refer to Section II.B of my testimony.

(h) These words are no longer part of my testimony.

(i) N/A.