

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
DOUGLAS F. CARLSON (DFC/USPS-T1-1)
(January 13, 2005)

The United States Postal Service hereby files the response of witness Arnetta L. Cobb to the following interrogatory of Douglas F. Carlson: DFC/USPS-T1-1, filed on January 4, 2005.

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, S.W.
Washington, D.C. 20260-1137
(202) 268-3083; Fax -3084

DFC/USPS-T1-1. Please refer to your response to DBP/USPS-T1-26.

- (a) Please confirm that parcels weighing 13 ounces or less that are originally sent as First-Class Mail may be too large to fit in the Priority Mail container used to reship a customer's mail. If you do not confirm, please explain.
- (b) Please explain why parcels weighing 13 ounces or less that are originally sent as First-Class Mail, that are sent without a special service requiring a scan, and that are too large to fit in the Priority Mail container used to reship a customer's mail will be reshipped at Priority Mail rates, with postage due, rather than forwarded as First-Class Mail with no postage due.
- (c) For the parcels described in (b), please explain why the Postal Service's plan to reship these parcels at Priority Mail rates, with postage due, would be more consistent with 39 U.S.C. § 3622(b)(1) and (2) and 39 U.S.C. § 3623(c)(1) and (2) than a plan that would forward these parcels as First-Class Mail with no postage due.
- (d) This interrogatory refers to parcels weighing 13 ounces or less that were originally sent as First-Class Mail. Please explain why a First-Class Mail parcel for which the sender has not purchased a special service that requires a scan should be forwarded or reshipped by a different class or subclass than a First-Class Mail parcel for which the sender has purchased a special service that requires a scan.
- (e) This interrogatory refers to parcels weighing 13 ounces or less that were originally sent as First-Class Mail. Please explain why the presence of a special service requiring a scan should affect the determination of whether the parcel will be forwarded via First-Class Mail or reshipped via Priority Mail.

RESPONSE:

(a) Confirmed. However, as noted in the Attachment to my response to OCA/USPS-T1-32, the likelihood that First-Class Mail parcels would fit into the PFS package is comparatively high due to their 13-ounce maximum weight limit.

(b) Please see the Attachment to my response to OCA/USPS-T1-32. As noted in that table, First-Class Mail parcels that do not require a scan, and that do not fit into the PFS package, would be reshipped as First-Class Mail, with no postage due. Accordingly, all mail pieces that would receive free shipment under PFS also would receive free forwarding if a forwarding order were filed.

(c) N/A

(d)-(e) Please see the Attachment to my response to OCA/USPS-T1-32. First-Class Mail parcels would be reshipped as First-Class Mail if they are not placed in the PFS package (either because they require a scan at delivery or are too large). The only distinction between First-Class Mail parcels that require a scan, and First-Class Mail parcels that do not require a scan, is that the latter would be included in the PFS package if they fit.