

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Experimental Premium Forwarding Service)

Docket No. MC2005-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS ARNETTA L. COBB (OCA/USPS-T1-36-42)
January 14, 2005

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-13 dated November 29, 2004, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T1-36. Please refer to your response to interrogatory OCA/USPS-T1-13 in which you indicate parcels addressed to a PFS customer that are not Priority Mail, Express Mail, or First-Class Mail would be re-sent Priority Mail postage due if they require a scan at delivery or do not fit into the PFS package. It appears that the order of packing PFS mail for reshipment is likely to affect whether a parcel will fit within the Priority Mail box and thus impact the cost to the PFS customer for parcels forwarded as Priority Mail postage due. For example, if the Postal Service employee packing mail for PFS reshipment first packs parcels, eligible for PFS reshipment, that fit into an available empty Priority Mail box and then fills the remainder of the space with letters and then, if necessary, uses a second Priority Mail letter or box for the remainder of the PFS reshipment, mailers may not be saddled as often with parcels re-sent Priority Mail postage due. On the other hand, if, while packing, the reshipment Priority Mail container is first filled with letter mail that substantially fills the Priority Mail letter or box, leaving no room for a parcel that would otherwise fit into an empty Priority Mail box, then the parcel would be forwarded postage due unless the packer places the parcel in a separate box without other mail and forwards it as a PFS reshipment piece.

- (a) In implementing PFS, will Postal Service policy require that when packing the weekly PFS Priority Mail shipment boxes, eligible parcels that fit will be placed first into the largest Priority Mail box available and all other PFS mail added where possible, and thus a second PFS Priority Mail reshipment box (or package) will be used if necessary for any remaining PFS mail? If not, please explain.

- (b) Please confirm that if the Postal Service does not follow a policy as outlined in subpart (a), above, PFS customers would be faced with an increased risk of postage due charges that amount to a wild card of unknown potential costs for PFS customers. If you do not confirm, please explain.
- (c) Will the Postal Service commit to instructing clerks, carriers or other employees preparing the weekly PFS Priority Mail shipment to pack the largest items first so as to lessen the number of Standard Mail and Package Services parcels that are reshipped Priority Mail postage due? If not, please explain.
- (d) Will the Postal Service, as a policy regarding the preparation of the weekly PFS Priority Mail boxes for reshipment, train employees to first pack the largest pieces in Priority Mail boxes so as to reduce the number of times PFS customers will be charged Priority Mail postage due for Standard Mail and Package Services parcels reshipped outside the weekly PFS Priority Mail shipment? If not, please, explain.

OCA/USPS-T1-37. Your testimony indicates that a carrier may fashion a box larger than a Priority Mail box, if necessary. Does that policy apply where a parcel is larger than the largest Priority Mail box available at the Postal Service? If so, what standard will be applied to determine when a larger box should be used? Will the policy be uniform throughout the nation? If not, why not?

OCA/USPS-T1-38. Please refer to your response to OCA/USPS-T1-32(b)-(c), and the table attached thereto entitled, "Disposition of Mail at Office Service Primary Address for

PFS Customer.” Please explain how tabloid size periodicals will be handled for reshipment if they do not fit into a Priority Mail box.

- (a) Will they be forwarded Priority Mail postage due? If not, please explain.
- (b) Will a box larger than available Priority Mail boxes be fashioned in order to forward large tabloid size periodicals without postage due? Please explain.

OCA/USPS-T1-39. Please refer to your testimony at page 5, lines 7-10, and your response to OCA/USPS-T1-19. Please explain why the Postal Service proposes to establish and maintain a Master Log, and explain the purposes for which the information contained in the Master Log will be used.

OCA/USPS-T1-40. Please refer to your response to OCA/USPS-T1-31, where it states, “In the absence of any quantitative means for this assessment, qualitative means would need to be pursued.” Please describe the “qualitative means” referred to in your response and the information and data sources to be relied upon for these “qualitative means.”

OCA/USPS-T1-41. Please refer to your response to OCA/USPS-T1-32(b)-(c), and the table attached thereto entitled, “Disposition of Mail at Office Service Primary Address for PFS Customer.” Please confirm that the rows labeled “LETTER w/ SCAN,” “FLAT w/ SCAN,” and “PARCEL w/ SCAN” should also refer to letters, flats and parcels requiring postage due at the primary address as being reshipped outside the weekly PFS Priority Mail reshipment package. If you do not confirm, please explain.

OCA/USPS-T1-42. Please refer to your response to OCA/USPS-T1-32(b)-(c), which discusses the reshipping of certain pieces outside the weekly PFS Priority Mail

reshipment package because those pieces require a scan at delivery. Also, please refer to your response to OCA/USPS-T1-22(b), where it states, "In most cases, I do not envision attaching a reshipping label to these pieces." Under what circumstances, or to what pieces, do you envision that a PFS reshipping label would be attached to pieces reshipped outside the weekly PFS Priority Mail reshipment package?