

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 SAMUEL J. KOROMA TO INTERROGATORY OF
DOUGLAS F. CARLSON (DFC/USPS-T4-1)
(January 14, 2005)

The United States Postal Service hereby files the response of witness Koroma to the following interrogatory of Douglas F. Carlson: DFC/USPS-T4-1, 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

/s/ _____
David H. Rubin

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DFC/USPS-T4-1. Please discuss the extent to which you considered the possibility that carriers could use Priority Mail flat-rate envelopes to reship customers' mail.

RESPONSE:

Depending on the mail makeup and volume, a Priority Mail flat-rate envelope may occasionally be used for a PFS shipment. But, as I said in response to DBP/USPS-T4-2(f), I do not believe that the weekly mail for a typical household would comfortably fit in a flat-rate envelope. Moreover, other PFS shipments may weigh more than three pounds, or be sent farther than zone 6. Therefore, I concluded that the three pound, zone 6 Priority Mail postage is a good average to use in this experiment. See my response to DBP/USPS-T4-2(f) and witness Cobb's response to DBP/USPS-T1-2.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

/s/ _____

David H. Rubin

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January 14, 2005