

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

EXPERIMENTAL PREMIUM  
FORWARDING SERVICE

Docket No. MC2005-1

DAVID B. POPKIN  
FOLLOW-UP INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE  
[DBP/USPS-T1-71-74]

January 28, 2005

I hereby submit interrogatories to the United States Postal Service. The instructions contained in the interrogatories DFC/USPS-1-18 filed May 21, 2001, in Docket C2001-1, are incorporated herein by reference.

Respectfully submitted,

January 28, 2005

David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

MC200510

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DBP/USPS-T1-71            Please refer to your response to DBP/USPS-T1-57 subpart d. [a] While you state that you believe that PFS is not designed for a customer who is unsure of her temporary address, or expects to periodically change her temporary address, do you believe that there are instances where a PFS customer could be faced with a change in plans that was unforeseen at the time of enrolling in the service? [b] If not, why not? [c] If so, how does the Postal Service propose to accommodate the needs of that customer?

DBP/USPS-T1-72            Please refer to your response to DBP/USPS-T1-57. [a] In the scenario presented in my original interrogatory, how does the PFS customer arrange for receiving non-PFS mail that is addressed to their temporary address is Florida after they leave and go to California or even for that matter return to New Jersey? [b] If your response to subpart a is that she would file a change of address order, why wouldn't the PFS mail being sent from New Jersey to Florida also be processed on the change of address order? [c] How would the Florida post office even know that the change of address order that was submitted was not permitted?

DBP/USPS-T1-73            Please refer to your response to DBP/USPS-T1-57. In the scenario presented in my original interrogatory, it would appear that there are five potential solutions to the referenced PFS customer [assuming that they do not want to physically return to the New Jersey post office and also assuming that they want to take advantage of the PFS service and not just file a "regular" change of address order], namely, [1] she could modify her PFS service to change the reshipping from New Jersey to Florida to reshipping from New Jersey to California; [2] She could cancel her PFS service from New Jersey to Florida and enroll in a new PFS service from New Jersey to California; [3] she could cancel her PFS service from New Jersey to Florida and let the mail sit in New Jersey until she returned to New Jersey; [4] she could file a change of address order in Florida so the any mail addressed to the Florida address, including PFS mail from New Jersey, would be forwarded to California; or [5] she could let the PFS program run its course and have the mail either sit in Florida wondering what to do with it or having it returned to the New Jersey post office as Undeliverable as Addressed. [a] Please confirm, or explain if you are not able to do so, that options 1, 2, and 4 above would not be permitted under the proposed PFS rules, option 1 would not be permitted because PFS can not be modified, it must be cancelled and re-enrolled; option 2 would not be permitted because enrollment must be physically done at the New Jersey location; and option 4 would not be permitted because a change of address order may not be utilized by a PFS customer. [b] Please provide any other potential scenarios you believe exist. [c] Why do you believe that options 3 or 5 would provide any service to the PFS customer particularly since the P in PFS stands for Premium? [d] Will any PFS mail that is returned to the New Jersey post office as Undeliverable as Addressed ultimately be delivered to the PFS customer at their permanent address in New Jersey? [e] If not, what disposition will be made of it?

DBP/USPS-T1-74            Please refer to your response to DBP/USPS-T1-57 subparts a and b. You indicate that having the PFS customer's mail travel from the sender to New Jersey to Florida to California would be wasteful and slow, and contrary to customers' interest in timely receipt of their mail. [a] Wouldn't the delivery of the mail this way still be faster than not receiving it at all as noted in the scenarios in DBP/USPS-T1-73? [b] If not, why not?

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

January 28, 2005

David B. Popkin