

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

---

EXPERIMENTAL PREMIUM  
FORWARDING SERVICE

---

Docket No. MC2005-1

RESPONSES OF UNITED STATES POSTAL SERVICE  
WITNESS ARNETTA L. COBB  
TO INTERROGATORIES OF DAVID B. POPKIN  
(DBP/USPS-T1-63-64)  
(February 8, 2005)

The United States Postal Service hereby files the responses of witness Arnetta L. Cobb to the following interrogatories of David B. Popkin: DBP/USPS-T1-63-64, filed on January 25, 2005.

Each 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

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

**DBP/USPS-T1-63.** Please confirm, or explain if you are unable to do so, that PFS may be utilized to and/or from an APO or FPO address.

**RESPONSE:**

As stated in my testimony at page 8, PFS mail may be reshipped to domestic delivery points only. DMM section G001.2.1 defines “domestic mail” as “mail transmitted within, among, and between the United States of America, its territories and possessions, Army Post Offices (APOs), Fleet Post Offices (FPOs), and the United Nations, NY.” Operationally, the Postal Service could deliver PFS mail to an APO or FPO; however, the reverse would not be possible since APOs and FPOs are operated by the military.

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

**DBP/USPS-T1-64.** This interrogatory relates to the use of orange Priority Mail pouches as a container for the reshipping of PFS to temporary addresses.

Please confirm, or explain if you are unable to do so, that

- (a) the Postal Service utilizes orange Priority Mail pouches;
- (b) these Priority Mail pouches are normally utilized to transport mail via Priority Mail between postal facilities.
- (c) these Priority Mail pouches are also utilized for drop shipments.
- (d) Please advise all uses of orange Priority Mail pouches for other than transporting mail between postal facilities, namely a non-postal employee is the preparer of the originating pouch and/or is the recipient of the pouch and opens it up.
- (e) Please confirm, or explain if you are unable to do so, that an orange Priority Mail pouch could be physically utilized as a container for reshipping PFS mail by placing the mail inside the pouch, closing the pouch, affixing a tag to the pouch showing that it should be transported to the PFS customer's temporary address, indicating that the PFS postage has been paid, transporting the pouch to the temporary address, and delivering it to the addressee.
- (f) Does the Postal Service plan to utilize orange Priority Mail pouches for reshipping PFS mail should that size pouch be an appropriate size container for the quantity of mail being reshipped?
- (g) If not, why not?

**RESPONSE:**

(a) Confirmed.

(b) I understand that the pouches are normally used to transport Priority Mail pieces within the Postal Service.

(c) Confirmed.

(d) My understanding is that orange Priority Mail pouches are used for transporting Priority Mail among postal facilities, so neither mailers nor delivery customers would ordinarily touch them. The one exception I have found consists of use with Priority Mail drop shipments, wherein the mailer actually places multiple items in an orange sack which is then opened at the destination facility.

(e)-(g) The Postal Service does not plan to use the pouch as a container for PFS shipments, even if it was physically capable of being utilized. While my

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

understanding is that Priority Mail drop shippers receive pouches in order to prepare their shipments, the Postal Service rarely delivers mail in a pouch.

Pouches are not intended for the delivery of mail to individuals or households; therefore, they would not be used for the PFS package.