

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

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EXPERIMENTAL PREMIUM  
FORWARDING SERVICE

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Docket No. MC2005-1

RESPONSES OF UNITED STATES POSTAL SERVICE  
WITNESS ARNETTA L. COBB  
TO INTERROGATORIES OF DAVID B. POPKIN  
(DBP/USPS-T1-71-74)  
(February 11, 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-T1-71-74, filed on January 28, 2005.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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

**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?

**RESPONSE:**

(a)-(b) It is certainly plausible that some PFS customers' initial expectations might vary from actual experience.

(c) Customer options have been explored extensively in this docket. An enrolled PFS customer's options, aside from using PFS on the terms originally planned, are limited to extension, shortening, or termination of service. A termination might be followed by any of the options addressed in Section IV of my testimony, or by re-enrollment in PFS.

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

**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 [sic] 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?

**RESPONSE:**

(a) Customer options here would overlap with those referenced in the response to DBP/USPS-T1-71. One sensible response might be to terminate PFS and then make use of some combination of other options.

(b) Your question appears to posit simultaneous use of PFS and temporary forwarding, which as I have explained in my responses to DBP/USPS-T1-44 and DBP/USPS-T1-57 would be precluded by the proposed DMCS language (Attachment A to the Request).

(c) I presume from the structure of your question that the hypothetical involves simultaneous use of PFS and a temporary forwarding order—a situation which would be addressed by the delivery unit serving the primary address. If the Florida facility needed to know about this situation, that knowledge could flow from the unit serving the primary address, the customer, or possibly from a carrier or clerk at the facility. Employees would be made aware of the prohibition on simultaneous PFS and Change of Address Orders in program materials and during training in order to help ensure that it does not occur.

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**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?

**RESPONSE:**

(a) It is incorrect to make a broad statement that PFS "can not be modified" because, as I have noted several times (most recently in my response to DBP/USPS-T1-70), customers could extend, shorten, or terminate their service period. That being said, it is correct, as I noted in my response to DBP/USPS-T1-57, that changing the temporary address (options 1 and 2) would require termination and re-enrollment at the primary address. It is also correct, as I noted in my response to DBP/USPS-T1-57, that option 4 would not be permitted.

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(b) I suppose there are any number of possible scenarios available to a customer who changes her temporary address, which might involve the various options available (and referenced in the response to DBP/USPS-T1-71). One might be reliance upon a Florida friend to get the mail to California.

(c) As reflected in my response to part (b), your options 3 and 5 are not exclusive of other alternatives for a customer who changes her temporary address. One must recognize that it would be impossible to create a service that meets the needs of every hypothetical customer capable of being conceived. By contrast, the PFS product design is quite simple. The term “Premium” reflects the fact that PFS would reship substantially all of a customer’s mail in a single package using Priority Mail, and that all classes of mail would be reshipped. As such, PFS would provide a level of service that expands upon the existing options and would presumably meet the needs of customers who enroll. The term “Premium” does not mean—as you seem to imply—that the individual needs of every conceivable customer would be satisfied. As proposed, PFS simply might not be a good option for a customer whose temporary address changes.

(d)-(e) Specific procedures addressing this possibility, if needed, have not been developed.

RESPONSE OF POSTAL SERVICE WITNESS COBB  
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**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 [sic] not receiving it at all as noted in the scenarios in DBP/USPS-T1-73?
- (b) If not, why not?

**RESPONSE:**

(a)-(b) As a proposed simple experiment, PFS is not designed for the hypothetical customer presented in DBP/USPS-T1-73. As I noted in my response to DBP/USPS-T1-44, PFS is designed as an exclusive alternative to temporary or permanent forwarding, not as an option that could be mixed with those existing options. Thus, if a customer wishes to have her mail sent to a new temporary address, but does not wish to re-enroll in PFS, she would be well advised to terminate service and submit a Change of Address Order.