

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

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS ARNETTA L. COBB  
TO INTERROGATORY OF DAVID B. POPKIN  
(DBP/USPS-T1-75)  
(February 14, 2005)

The United States Postal Service hereby files the response of witness Arnetta L. Cobb to the following interrogatory of David B. Popkin: DBP/USPS-T1-75, filed on January 31, 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

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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-T1-75.** Please refer to your responses to DBP/USPS-T1-62 and OCA/USPS-T1-37. DMCS Section 521.61 permits Package Services to have a combined length and girth of not greater than 130 inches. DMCS Section 231 limits the combined length and girth for Priority Mail to a maximum of 108 inches. Proposed DMCS Section 937.11 states that parcels too large for the weekly reshipment would be sent via Priority Mail, postage due.

- (a) Please explain how a PFS customer receiving a parcel with a combined length and girth of between 108 and 130 inches would have that parcel forwarded by Priority Mail since it would exceed the size limits for Priority Mail.
- (b) Please explain how the Postal Service plans to correct the conflict in the wording of the DMCS.

**RESPONSE:**

- (a) If an oversized Parcel Post parcel is addressed to a PFS customer's primary address, it would be reshipped to the temporary address postage due at the appropriate Parcel Post oversized rate, because it is ineligible to be sent Priority Mail. The Postal Service expects that this situation is unlikely to occur, however. For instance, as with other Package Services parcels, customers typically have control over when and where oversized parcels are sent to them, and would thus be provided an incentive to have those parcels sent directly to their temporary address.
- (b) The Postal Service is currently exploring how best this unlikely but technically possible situation should be reflected in proposed DMCS section 937.