

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-T1-81-83)
(February 28, 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-T1-81-83, filed on February 14, 2005. An objection to interrogatories DBP/USPS-T1-76-80 was filed on February 23, 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-T1-76. Please refer to your response to DBP/USPS-T1-64.

- (a) Please confirm, or explain if you are unable to do so, that mailers do present Priority Mail to the Postal Service in Priority Mail pouches (see USPS linkonline posted February 7, 2005 at 12:30 PM ET as an example).
- (b) Please confirm, or explain if you are unable to do so, that the Postal Service also provides drop shipments in the reverse manner than described in your response to subpart d of DBP/USPS-T1-64, namely, the Postal Service will take mail arriving at a local address and place it in a Priority or Express Mail pouch and forward it to an addressee at another location such as might be done with a film developer having all of the film having mail [sic] that is sent to a New Jersey address being forwarded to a centralized address in another state for processing.

RESPONSE:

Objection filed.

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

DBP/USPS-T1-77. Please refer to your response to DBP/USPS-T1-64 subpart e. Your response stated "even if it was physically capable of being utilized." Please confirm, or explain if you are unable to do so, that the scenario described could be, as opposed to "even if", physically utilized as a container for reshipping PFS mail.

RESPONSE:

Objection filed.

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

DBP/USPS-T1-78. Please refer to your response to DBP/USPS-T1-64 subparts e through g. Your response stated that the Postal Service rarely delivers mail in a pouch. Under what scenarios would this "rare" occasion take place?

RESPONSE:

Objection filed.

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

DBP/USPS-T1-79. Please refer to your response to DBP/USPS-T1-64 subparts e through g. Your response stated that pouches are not intended for the delivery of mail to individuals or households. Is this because individuals or households normally do not receive the volume of mail that would be entailed in delivering it in a pouch or is it because there is a reason to limit delivery in pouches only to classes of addressees that are not individuals or households. If so, please provide the reasons for this limitation and also advise the classes of addressees that are eligible to receive delivery in pouches and the conditions under which it might occur.

RESPONSE:

Objection filed.

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TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-80. Please refer to your response to DBP/USPS-T1-64 subparts e through g. If an individual or household received the volume of mail that warranted utilization of a Priority Mail pouch for reshipment of this mail, please explain why a pouch could not be utilized.

RESPONSE:

Objection filed.

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TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-T1-81. Please refer to your response to DBP/USPS-T1-65. Please advise how the USPS employee will make the determination on whether to include the parcel in the reshipment container or not based on the volume of non-parcels to be shipped for the entire week since, if the parcel is not to be included in the reshipment parcel, it would have to be reshipped immediately and the employee would not know the volume of non-parcels until the end of the week.

RESPONSE:

This question incorrectly states that all parcels “have to be reshipped immediately.” The only parcels that would “have to be” immediately rerouted to the temporary address would be Express Mail, Priority Mail, and parcels that require a scan. Other parcels would generally be held until Wednesday, when the employee would make an educated decision, after considering the dimensions of the parcel and the dimensions of the eligible letters, flats, and periodicals received that week, as to whether to include the parcel in the PFS package or reship it separately.

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DBP/USPS-T1-82. Please refer to your response to DBP/USPS-T1-67. You appear to have misinterpreted my original interrogatory. What I suggested would be the placing of a similar barcode on the outside PFS container such as, if there were one or more Delivery Confirmation articles inside the PFS container, a regular Delivery Confirmation barcode could be affixed to the outside of the PFS container and then both the inside, original barcode(s) could be scanned and then the outside, new barcode could be scanned with appropriate arrangements so that future scanning of the new, outside barcode would transfer the information to all of the inside, original barcodes. This would be similar to the firm delivery of multiple accountable mailpieces where the scanning of a single barcode transfers the data to all of the individual pieces. If necessary, please redirect this interrogatory for institutional response.

RESPONSE:

The experimental version of PFS proposed by the Postal Service is a simple product that uses manual processes in the delivery unit. This interrogatory assumes a more complicated product that interacts with systems supporting other services. The Postal Service has not explored the cost consequences of such a more complicated product. While such a product might be considered in the future, it would not be consistent with PFS as proposed.

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DBP/USPS-T1-83. Please refer to your response to DBP/USPS-T1-70. You indicate that a personal visit must be made at the post office serving the primary address so that customer verification could be accomplished. Assume that the visit is made to another branch or station of the post office providing actual delivery to the customer, for example, if I get my mail delivered by the Village Station 10014 in Manhattan, New York City, and I visit the Gracie Station 10028 in Manhattan to enroll or reenroll in PFS.

- (a) Please specifically describe each and every interaction that would take place at the Gracie Station between the PFS customer and postal employee as relates to providing customer verification. Please also indicate the means of communication or correspondence that might take place between the employee at the Gracie Station and the Village Station or other facility of the New York post office.
- (b) Please specifically explain why each of the items noted in your response in subpart a could not equally be conducted between the employee at the Village Station and, for example, a USPS employee at the Tampa, Florida post office.

RESPONSE:

(a) For a discussion of the customer verification process, please see my testimony at pages 3-4 and my responses to DBP/USPS-T1-33, OCA/USPS-T1-17, and OCA/USPS-T1-18. Specific customer verification procedures beyond those provided in my testimony and earlier interrogatory responses have not yet been developed. As I noted in my responses to DBP/USPS-T1-33 and OCA/USPS-T1-16, if the PFS application is properly submitted at a facility other than the delivery unit serving the customer's primary address, but under the same administrative supervision as the delivery unit, then the application would be forwarded to the delivery unit; more specific details about how this would occur have not yet been developed.

(b) Enrollment at a facility that is administered by the same main post office as the primary address delivery unit is qualitatively different than enrollment at a facility that is not administered by the same main post office as the primary

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address delivery unit. For example, there is necessarily a great deal of routine coordination within a multi-facility post office that does not exist to the same extent with facilities that are across the country.