

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

EXPERIMENTAL PREMIUM  
FORWARDING SERVICE

Docket No. MC2005-1

DAVID B. POPKIN  
MOTION TO COMPEL RESPONSE TO DBP/USPS-T1-84-85  
March 14, 2005

Respectfully submitted,

March 14, 2005

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

MC20051T

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On March 10, 2005, the Postal Service made an objection to responding to my interrogatories DBP/USPS-T1-84-85 that were submitted by me on March 2, 2005. The purpose of these interrogatories was to follow-up on the Postal Service's response to DBP/USPS-T1-82-83.

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

**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.

**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) Allowing enrollment at a facility that is not administered by the same main post office as the primary address delivery unit was considered but rejected during the development of the PFS product design for the following reasons:

1) Offices within a multi-facility post office routinely courier information among themselves and are familiar with what facility handles mail for which zones.

Inter-facility interaction and communication are thus routine and commonplace, whereas they are not in the case of distant offices. Allowing remote enrollment in a distant office could, for example, delay the customer's application, increase the possibility of it getting lost in the system, and increase the potential for a mail security problem.

2) Local offices are familiar with the primary residence addresses in their areas, which reduces the possibility of errors and aids in the prevention of fraud. For example, a local clerk could easily verify the customer's primary address information when the address provided is in doubt, thereby avoiding application reversals and refunds. In addition, it would be easier to present a fraudulent application at a post office unfamiliar with the primary address.

DBP/USPS-T1-84            Please refer to your response to DBP/USPS-T1-82. Your response failed to respond to my original interrogatory. The level of "complication" of the product is up to the Postal Rate Commission to decide after evaluating the Postal Service's proposal and the comments of the intervening parties. I would like to propose on Brief that

the wording of proposed DMCS Section 937.11 be modified to eliminate the reference to reshipment of mail which requires a scan upon delivery being sent Priority Mail postage due. In order to be able to accurately make this claim, the information requested in this interrogatory is needed. The Postal Service is the only party that has the information requested. Since this interrogatory is reasonably calculated to lead to the discovery of admissible evidence, I again request a response to DBP/USPS-T1-82.

DBP/USPS-T1-85 Please refer to your response to DBP/USPS-T1-83. Your response failed to respond to my original interrogatory. I would like to propose on Brief that the wording of proposed DMCS Section 937.31 be modified to eliminate the reference to making the request at the post office responsible for delivery to that customer's primary address. I am attempting to show that the interaction that takes place between the Gracie Station [a different station of the post office responsible for delivery to the customer's primary address] and the Village Station [the station that is responsible for delivery] of the New York, NY post office would be done in a manner which would be no different than would be conducted between the Tampa, Florida post office [a remote location]. My belief is that the interactions would all be done by a means that did not require an employee of the Gracie Station to physically travel down to the Village Station but would be done in a manner, such as telephone, fax, or mail, which would exist equally between Tampa and the Village Station. The Postal Service is proposing to allow for termination or extension of PFS to be done without making a physical appearance to the post office responsible to the customer's primary address. However, the Postal Service is also proposing to not permit modification of the PFS service but to require the original service to be terminated and have the customer re-enroll in a new service. Furthermore, the Postal Service is requiring that enrollment or re-enrollment must be accomplished at the post office, including any stations or branches, responsible for delivery to the PFS customer's primary address. Therefore, an enrollment or re-enrollment in PFS would not only require an additional \$10 fee for re-enrollment for a change but would also require a physical appearance at the post office responsible for the PFS customer's primary address. If a customer established PFS to send the mail from New York City to Florida and then while in Florida found it necessary to change the address in Florida that they receive the mail or even to have to go to California directly from Florida, they would have to make a physical trip back to New York just to walk into the New York post office and present a new application. I would like to be able to show on Brief that this trip from Florida to New York City is unnecessary and completely inappropriate. The Postal Service is the only party that has the information requested. Since this interrogatory is reasonably calculated to lead to the discovery of admissible evidence, I again request a response to DBP/USPS-T1-83.

The purpose of interrogatory DBP/USPS-T1-84 was to develop information that would allow me to make a presentation on Brief that would show that it was possible for the Postal Service to include articles in the PFS shipment that required a scan on delivery, such as delivery confirmation. In order to make this request on Brief, I need information as to the feasibility of my proposal. While Witness Cobb may not have information as to the feasibility of my proposal, there should be other employees of the Postal Service who are familiar with

scanning system presently utilized and can respond whether my proposal is possible to accomplish either under the present system of scanning or with an easily made modification. In order to be able to accurately make this claim, the information requested in this interrogatory is needed. If my proposal is not physically possible, then it would be inappropriate to make this request for a DMCS wording change since the Postal Service could not comply with it should the Commission agree with my proposal. The Postal Service is the only party that has the information requested. Since this interrogatory is reasonably calculated to lead to the discovery of admissible evidence, I again request a response to DBP/USPS-T1-82.

The purpose of interrogatory DBP/USPS-T1-85 was to develop information that would allow me to make a presentation on Brief that would show that it was possible for the Postal Service to allow for modification of the temporary address without requiring a physical visit to the permanent postal facility.

If a customer established PFS to send the mail from New York City to Florida and then while in Florida found it necessary to change the address in Florida that they receive the mail or even to have to go to California directly from Florida, they would have to make a physical trip back to New York just to walk into the New York post office and present a new application. I would like to be able to show on Brief that this trip from Florida to New York City is unnecessary and completely inappropriate. The Postal Service is the only party that has the information requested. My perception is that the relationship between the Gracie Station and the Village Station of the New York, NY post office is such that there is a sufficient difference in these two stations as to remove the claimed knowledge and arrangements that might exist between them [as opposed to what might exist between subordinate units of a much smaller postal facility]. Since this interrogatory is reasonably calculated to lead to the discovery of admissible evidence, I again request a response to DBP/USPS-T1-83.

As such these interrogatories are reasonably calculated to lead to the discovery of admissible evidence and for the above reasons, I move to compel a response to DBP/USPS-T1-84-85.

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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.

March 14, 2005

David B. Popkin