

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

PREMIUM FORWARDING SERVICE

Docket No. MC2007-3

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ABDIRAHMAN
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE,
OCA/USPS-T2-1-2
(September 4, 2007)

The United States Postal Service hereby provides the responses of witness Abdul
Abdirahman to the following interrogatories of the Postal Regulatory Commission's Office of the
Consumer Advocate (OCA): OCA/USPS-T2-1-2, filed on August 20, 2007.

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 UNITED STATES POSTAL SERVICE WITNESS ABDIRAHMAN TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T2-1: The following interrogatory refers to your testimony, "Premium Forwarding Service Cost Analysis," page 3. Please provide a copy of all your results of the "Special Studies Field Observation" referenced in footnote 2.

RESPONSE:

For purposes of answering this question, I assume the reference in quotation marks refers to page three of the Attachment to my testimony, since the quoted words do not appear in that form on page three of my testimony. The following notes were made by me during or shortly after my field observations. While counsel has made them more readable, I reviewed them closely to make sure they accurately reflect the content of my notes. In addition, facility-specific references have been masked, as have references to identifiable individuals.

[Florida] Post Office, March 22, 2007

This branch delivery unit is a suburb of Tampa. It has 7 city routes and no rural routes. It also has 2 POS terminals. A Customer Service supervisor explained that office's PFS procedures to me.

Customers who decide to use PFS complete and submit a PFS application, PS Form 8176, in person to a clerk at a retail window. Valid identification must be presented and verified prior to processing of the application, and the enrollment fee and all weekly fees are collected at the time of application. The Point of Sale (POS) system contains three accounts specific to PFS for: Set Up, Reshipment, and Refunds. At this facility, the window clerk calculates total fees manually. A copy of PS Form 8176 is provided to the Delivery Supervisor who notifies each carrier of the need to hold that PFS customer's mail for Wednesday shipping but

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retains the Form 8176 at the Supervisor's desk. The Supervisor prints address labels, and attaches them to each application. G400 labels are also kept at the Supervisor's desk.

On Wednesday, the Supervisor collects PFS mail from the carrier's hold mail area, repackages it, and places it with other outgoing Priority Mail. Most of the customers who use PFS Service in this facility receive heavy volumes of mail. Priority Mail packaging similar to Flat Rate box capacity is used to ship PFS mail, although the Flat Rate box itself was not. Occasionally two boxes are necessary to contain a single customer's mail, due to the heavy volume of mail that some customers receive. Each shipment gets logged on the back of the PFS application.

No major issues or complaints regarding the PFS service or its price had been received by this office. Customers are very excited about the availability of PFS.

[Iowa] Post Office, May 22, 2007 9:00 am

This facility has 30 city routes and 15 rural routes. It has four Carrier Sequence Bar Code Sorters (CSBCS) machines and three window terminals. When a customer applies for PFS, a customer folder is established. This folder contains a copy of the PFS application, G400 and address labels, and any miscellaneous information. A Master Log containing PFS customer information is maintained at this office. A hold mail card with PFS marking is handed to the carrier who may use it on the case as a label. Each carrier separates PFS customer mail every day and stores it at the cases or in a central hold mail location. A distribution

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clerk is in charge of the repackaging process. The clerk uses computer generated labels on all customer PFS packages. I observed all shipments that day. One customer required two containers due to a heavy volume of medical periodicals. "Flat rate boxes" were used as PFS packages, while one customer's mail only required a single, flat rate Priority Mail envelope. The clerk goes to each carrier case that has PFS mail (or to the central location), collects the mail, puts it in a Priority Mail envelope or box, closes it, and applies the G400 label and the address label on the package. When I visited, they ran out of G400 labels and used G10 labels instead. Each package was then placed with outgoing mail waiting for dispatch. The clerk keeps track of each shipment sent. No major issues or complaints regarding the PFS service or its price were ever received by this office. Customers are very excited about the availability of PFS.

[Iowa] Post Office, May 22, 2007 11:00 am

This facility has 17 city routes, 17 rural routes, and four window terminals. A customer folder is established when a customer applies for PFS. This folder contains a copy of the PFS application, G400 and address labels, and any miscellaneous information. A Master Log containing PFS customer information is maintained at this office. A hold mail card with a PFS marking is given to each affected carrier so that the case can be marked. The carrier separates PFS customer mail every day and stores it at individual cases or in a central hold mail location. A window clerk is in charge of the repackaging process. The clerk uses computer generated labels on all PFS packages. I observed all shipments that day. Priority Mail Boxes (13 and one-fifth inches by 12 inches, with 3 inch depth)

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were used for all reshipments. The clerk goes to each carrier case which has PFS mail, collects it, and then verifies that no mail for other customers is included. Then the mail is packaged with the G400 label, and the address labels are affixed on the package. The package is then placed with other outgoing mail waiting for dispatch. The clerk marks the tracking log, verifying that the shipment has been sent. No major issues or complaints regarding the PFS service or its price have been received by this office. Customers are very excited the about the availability of PFS.

[Connecticut] Post Office, July 11, 2007

9:30 am

This facility has 3 rural and 13 city routes, and three window terminals. When a customer applies for PFS, a customer folder is established. This folder contains a copy of the PFS application, the G400 and address labels, and any miscellaneous information. A Master Log containing all PFS customer information is maintained at this office. A hold mail card with a PFS marking is handed to the carrier as a notification to the carrier. Each carrier separates PFS customer mail every day, and stores it at individual cases or in the central hold mail location. A distribution clerk is in charge of the repackaging process. The clerk uses computer generated labels for folks who sign up more than five weeks, but she handwrites the labels for those who are away less than five weeks. I observed all of that day's shipments. Three customers required two containers due to the heavy mail volume. One customer required three

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containers. Priority Mail boxes (13 and one-fifth inches by 12 inches, with 3 inch depth) were used for all reshipments, except one which only required a single Tyvek envelope. The clerk goes to each carrier case that has PFS mail, collects it, packages it, and applies the G400 label and address labels. The package is then placed with outgoing mail for dispatch. The clerk marks the tracking log, verifying that the shipment has been sent. No major issues or complaints regarding the PFS service or its price have been received by this office. Customers are very excited about the availability of PFS.

[Connecticut] Post Office, July 11, 2007

11:25 am

This facility has 17 rural routes and 2 city routes. There are three Postal One terminals at the window and a close out terminal in the back office. There are 7 clerks and one Transitional Employee. This facility, which has 4,000 deliveries, is one of the best performing offices in the district. When a customer applies for PFS, a folder is established that contains a copy of the PFS application, G400 labels, preprinted computer generated address labels, and any miscellaneous information. A Master Log containing all PFS customer information is maintained at this office. A hold mail card with PFS marking is provided to the carrier. Each carrier separates PFS customer mail every day and stores it at a central hold mail location. A Part Time Flex (PTF) distribution clerk is in charge of the repackaging process, and uses preprinted computer generated address labels for all PFS customers. I observed all of that day's shipments. Four customers required three containers per customer due to heavy mail volume. Three

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customers also required two containers. Priority Mail boxes (13 and one-fifth inches by 12 inches, with 3 inch depth) were used for all reshipments. One Parcel Select package with Delivery Confirmation service was upgraded into a Priority Mail PFS package. (This clerk did not know that, under the PFS program guidelines, he is supposed to send all Standard Mail and Parcel Select packages postage due.) The PTF clerk uses rolling stock to move mail to the central hold mail location (there are three such designated locations), collects the mail, puts it in the Priority Mail container, closes it, and applies the G400 address labels on the package. These steps are repeated for each customer with care taken to avoid sending other customers' mail to the wrong address. Each package is then placed with outgoing mail for dispatch. The clerk marks the tracking log indicating each shipment sent. No major issues or complaints regarding PFS service or its price have been received by this office. Customers are very excited about the availability of PFS.

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OCA/USPS-T2-2: The following interrogatory refers to your testimony at page 4. You state:

While a clerk may perform some of the in-office functions associated with the preparation of PFS mail for shipment, the higher labor rates for carriers are used for all activities because field site visits revealed that many of the activities are performed by carriers, but also by a range of other postal personnel.

Please provide a list of the field sites referenced above. Please provide any notes taken, summaries or calculations made regarding the field site visits.

RESPONSE:

Please see my response to OCA/USPS-T2-1. Also, please see the attached Excel file.

Field Observations of PFS Repackaging

Date	City	State	Number of Shipments	Time it took for repackaging		Time per Shipment	
				Minutes	Seconds	Minutes	Seconds
3/22/2007	#	FL	1	3	23	3	23
5/21/2007	#	IA	6	15	0	2	30
5/21/2007	#	IA	2	8	23	4	12
5/23/2007	#	NE	2	7	6	3	33
7/11/2007	#	CT	31	111	23	3	36
7/11/2007	#	CT	20	73	13	3	40
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Total			62	217	88	3	31