

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

PREMIUM FORWARDING SERVICE

Docket No. MC2007-3

**NOTICE OF THE UNITED STATES POSTAL SERVICE
OF FILING INSTITUTIONAL RESPONSES TO INTERROGATORIES
FROM DAVID POPKIN
DBP/USPS-11-21
(September 27, 2007)**

The United States Postal Service hereby provides institutional responses to the following interrogatories from David B. Popkin, filed on September 24, 2007: DBP/USPS-11-21.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID B. POPKIN

DBP/USPS-11. Please refer to your response to Interrogatory DBP/USPS-1 subparts a and b.

Please confirm, or explain if you are unable to confirm, that, according to the regulations and policies for PFS, the only way to accomplish the desired change referred to in Interrogatory DBP/USPS-1 in my Premium Forwarding Service would be to make a visit in person to the Englewood NJ Post Office.

RESPONSE:

Confirmed that PFS guidelines specify that a new PFS application, such as that described in the response to DBP/USPS-1(a-b), be submitted in person at a Post Office, station, or branch serving the customer's permanent address. See also the responses to DBP/USPS-9 and 14.

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DBP/USPS-12. Please refer to your response to Interrogatory DBP/USPS-1 subparts a and b.

- (a) Please confirm, or explain if you are unable to confirm, that one of the purposes that a service that is being provided under an experimental service is to learn what changes might be made as a result of information learned during the experimental period.
- (b) Please list those items that were learned during the experimental period.
- (c) Please explain why the current docket does not include any of the customer needs and responses have not been included in this docket.

RESPONSE:

- (a) Assuming that this statement is intended to convey the concept that one possible purpose of an experiment is to learn what features of a product or service might be changed or added to make it more attractive to customers, it is confirmed.
- (b) An exhaustive list of “items that were learned during the experimental period” by USPS has not been compiled, and is probably impossible to construct. However, for a partial record of information relating to PFS collected during the experimental period, see Witness Hope’s testimony (USPS-T-1), especially sections III-V and Attachment 1; Witness Abdirahman’s testimony (USPS-T-2), section IV and the Appendix; Witness Dawson’s testimony (USPS-T-3), especially section VI and Attachments 3 and 4; Witness Hope’s responses to interrogatory OCA/USPS-T1-4 (including the attachment) and 7; Witness Abdirahman’s response to interrogatories OCA/USPS-T2-1 and 2; and the response of USPS to interrogatories DBP/USPS-5(c) and 6(a).
- (c) Assuming that his question is attempting to ask why no changes to PFS were included in the current docket, see the response to DBP/USPS-1(n), DBP/USPS-5(e-g), and DBP/USPS-9.

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DBP/USPS-13. Please refer to your response to Interrogatory DBP/USPS-1 subpart e.

- (a) Please confirm, or explain if you are unable to confirm, that if I were to file a Change of Address Order at the Boca Ration FL post office to forward my mail to me at my new Tampa FL location that the Boca Raton post office would not forward a Priority Mail article that arrived because it was a PFS shipment.
- (b) Please advise what would happen to the piece of mail.

RESPONSE:

- (a) Confirmed.
- (b) A PFS piece destined for an address that has been vacated by the customer would be returned to the originating office.

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DBP/USPS-14. Please refer to your response to Interrogatory DBP/USPS-1 subparts g through m.

- (a) Please confirm, or explain if you are unable to confirm and provide references to the specific regulations and policies, that the regulations and policies that exist for PFS provide for one answer to all of those questions, and that is to show up IN PERSON at the Englewood NJ post office and transact your business there.
- (b) Please confirm, or explain if you are unable to confirm, that any postal employee who allows for any changes to be made by any other means other than an IN PERSON visit to the Englewood NJ post office is doing so either because they are not fully aware of the complete regulations and policies and/or are just doing what they feel is appropriate to meet the needs of the customer.
- (c) Please advise what weight, if any, should be given to the ability of the postal employee to recognize the voice and/or handwriting. Please explain your response.

RESPONSE:

Current PFS guidelines specify that PFS transactions occur in person at the originating office. However, at his or her discretion, a Postal Service official may find it appropriate to complete such transactions by other means in cases where there are extenuating circumstances and he or she can satisfactorily verify a customer's identity and collect the required timely payment (if any).

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DBP/USPS-15. Please refer to your response to Interrogatory DBP/USPS-1 subpart n. I am not asking what the customer satisfaction would be to the responses to written cross-examination in litigation but to what it is believed would be the customer's reaction to having received responses that indicated that they would be required to make an in person visit to the Englewood NJ post office to transact their business. Please provide that response.

RESPONSE:

This question appears to assume that a customer will universally be denied the opportunity to conduct PFS transactions by any method other than in person at an office or branch serving his or her permanent address, no matter what the circumstances. However, this is not necessarily the case. Please see the response to DBP/USPS-14.

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DBP/USPS-16. Please refer to your response to Interrogatory DBP/USPS-2 subparts a and b.

Please confirm, or explain if you are unable to confirm, that, according to the regulations and policies for PFS, the only way to accomplish the desired change referred to in Interrogatory DBP/USPS-2 in my Premium Forwarding Service would be to make a visit in person to the Englewood NJ Post Office.

RESPONSE:

Not confirmed. Although PFS guidelines specify that PFS transactions occur in person at the originating office, there is currently no specific policy for how requests for early termination of the service should (or should not) be allowed, as stated in the original answer to DBP/USPS-2(a-b). See also the response to DBP/USPS-14.

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DBP/USPS-17. Please refer to your response to Interrogatory DBP/USPS-3 subpart a.

Please confirm, or explain if you are unable to confirm, that, according to the regulations and policies for PFS, the only way to accomplish the desired change referred to in Interrogatory DBP/USPS-3 in my Premium Forwarding Service would be to make a visit in person to the Englewood NJ Post Office.

RESPONSE:

Confirmed, but see also the response to DBP/USPS-14.

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DBP/USPS-18. Please refer to your response to Interrogatory DBP/USPS-5 subparts e through g.

Please confirm, or explain if you are unable to confirm, that since the Postal Service claims that the current proposal seeks only to make permanent the form of PFS now offered as an experiment that there has been no evaluation of any potential need for expanding the methods by which a customer may sign up for PFS or modify an existing order.

RESPONSE:

Not confirmed. See the testimony of Witness Hope (USPS-T-1), sections V(A) and (B), and Witness Hope's responses to interrogatories OCA/USPS-T1-3, 4, 6, and 7.

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DBP/USPS-19. Please refer to your response to Interrogatory DBP/USPS-8 subpart c.

Please confirm, or explain if you are unable to confirm, that COA vs. PFS goes beyond just involving customer addresses, namely both of them relate to the forwarding of a customer's mail from one address to another address.

RESPONSE:

Assuming this statement is attempting to convey the idea that both Temporary COA and PFS entail movement of mail from a customer's permanent address to that customer's temporary address, it is confirmed. There are important differences between them. Compare the product description of PFS in Witness Hope's testimony (USPS-T-1), section II(B), with the description of Forwarding in section II(D) and the response to DBP/USPS-5(d).

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DBP/USPS-20. Please refer to your response to Interrogatory DBP/USPS-8 subpart d.

Please explain why you believe that the presentation in person of a government issued photo ID card at the local post office and completing and signing a form is not necessarily more secure than just dropping a PS Form 3675 [sic] in the local blue collection box anywhere in the country.

RESPONSE:

Both systems include an identity-verification method. In addition, the COA process includes additional authentication methods as described in the response to DBP/USPS-4(g).

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DBP/USPS-21. Please refer to your response to Interrogatory DBP/USPS-9.

Please provide specific responses to each of the six subparts rather than a generalized response to the overall context of the Interrogatory.

RESPONSE:

Note: where responses to respective parts, below, appear in quotation marks, responses are word-for-word identical to language in the previous response provided to interrogatory DBP/USPS-9; where quotation marks are not employed, these responses paraphrase the logic underlying the previously supplied complete response.

- (a) "The office that performs the labor underlying PFS prices also gets credit for PFS revenue, and service can commence quickly without the need to expand inter-facility processes beyond those already extant in multi-facility Post Offices."
- (b) Confirmed.
- (c) Unable to confirm. It is possible that the form would be forwarded, but there is no formal process in place to ensure it happens. There is also no formal process in place to transfer the associated revenue between Post Offices.
- (d) "A multi-facility Post Office must already coordinate the complete range of mail-processing, collection, delivery, and retail services for all customers in an exclusive service area. So coordination for PFS in its current form makes no additional demands upon the existing infrastructure that might be necessary for coordination among other pairs of facilities."
- (e) Confirmed.
- (f) See the responses to parts (c) and (d) of this interrogatory.