

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

PREMIUM FORWARDING SERVICE

DOCKET NO. MC2007-3

INITIAL BRIEF OF DAVID B. POPKIN

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Respectfully submitted,

MC20073BRIEF

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In this Docket, the Postal Service is proposing to convert the Premium Forwarding Service into a permanent service. Premium Forwarding Service is a good service and should be approved with one exception. There is one feature of this program that is absolutely abhorrent. The Postal Service regulations require that any action that a customer of the service takes must be conducted in person at the post office¹ that serves the customer's permanent address. This requirement for an in person transaction can lead to a number of scenarios that are totally inappropriate.

Since the object of this service is to forward the mail of a party that is at a temporary address, it is likely that this temporary address will be at some distance from the customer's permanent address. It is noted that 73.4%² of the PFS shipments were to Zones 5 and beyond providing a distance of 601 miles or more that would have to be traveled back to the post office serving the customer's permanent address.

Interrogatories DBP/USPS-1, -2, and -3 pose scenarios where a customer living in New Jersey and spending the winter in Florida comes up with the necessity of

¹ It may also be conducted in person at a station or branch of the post office that serves the customer's permanent address.

² Attachment 1 to USPS-T-2.

changing the PFS that was originally signed up for. In DBP/USPS-1, the customer changes the temporary address from one location in Florida [Boca Raton] to another location in Florida [Tampa]. In DBP/USPS-2, the customer finds it necessary to return home to New Jersey earlier than expected.³ In DBP/USPS-3, the customer wishes to extend the PFS shipments.

For all three of these scenarios, the official Postal Service response is that the customer will be required to make a special trip up to New Jersey just to be able to make their in person visit to the local post office serving the permanent address.

As a result of a follow-up Interrogatory DBP/USPS-14, the Postal Service indicated that while the current PFS guidelines require the in person visit to the post office serving the permanent address, a local Postal Service official may find it appropriate to complete the necessary transactions without requiring the in person visit. While I would believe that most Postal Service officials would have the "common sense" to not require a customer to make a trip from Florida to New Jersey, it is inappropriate to have regulations which state the opposite.

As noted in Interrogatory DBP/USPS-4, there are three methods by which a customer may file a Change of Address Order, namely hardcopy PS Form 3575, on the Internet, or by Telephone. Each of these three methods will allow a customer to have the Postal Service redirect/forward a customer's mail from location A to location B, either for a temporary period or permanently. None of these methods require a customer to make an in person visit to a post office.

As noted in Interrogatory DBP/USPS-13, if the customer were to change their temporary address from Boca Raton FL to Tampa FL and file a Change of Address Order at the Boca Raton FL post office, all of the customer's mail⁴ would be forwarded to Tampa FL except that a PFS shipment would not be forwarded. The PFS shipment

³ The timing was designed to be such that a shipment would have been made while the customer was enroute back to New Jersey.

⁴ Mail that is covered by the Change of Address Order.

would be returned to Englewood NJ and sit there waiting for the customer to return home. This would be done even though the other mail is being forwarded to Tampa and the Boca Raton post office would have every reason to believe that the customer would get the PFS shipment if it was forwarded to Tampa.

In the Stipulation and Agreement filed by the Postal Service on October 11, 2007, it would appear that the Postal Service and other participants recognized the need for changing the requirements that all transactions be completed in person at the post office serving the customer's permanent address.

8. To establish or modify service, PFS in its current form necessitates direct contact between a customer and a postal representative of the Post Office which serves that customer's primary address. All participants in Docket No. MC2007-3, including the Postal Service, want customer alternatives for establishing or modifying service that avoid this necessity. The Postal Service accordingly affirms its commitment to developing – as soon as available resources and priorities permit – alternatives that do not require direct contact between the PFS customer and a representative of the Post Office serving that customer's primary address.

I was not given the opportunity to develop the wording for this or other parts of the Stipulation and Agreement. Postal Service counsel provided me with a courtesy copy of the final version of the filing in an e-mail sent at 5:58 PM on the day before filing. I believe that it is inappropriate for a Settlement Coordinator to not contact all of the participants in a Docket.

For the reasons stated above, the Postal Regulatory Commission should indicate in the strongest way possible to the Postal Service in the Recommended Decision that the Postal Service implement regulations which do not require in person visits to establish or modify a Premium Forwarding Service request.