

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Experimental Premium Forwarding Service )

Docket No. MC2005-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS ARNETTA L. COBB (OCA/USPS-T1-23-35)  
December 20, 2004

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Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-13 dated November 29, 2004, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T1-23. Please refer to your response to OCA/USPS-T1-2(a), where it states, "Customers did pay postage in advance for these informal arrangements [by] . . . depositing funds in a postal administered account. [E]ach package is weighed and rated so that the appropriate postage is applied, with the postage amount deducted from the customer's account."

- (a) Please describe the features and operation of a "postal administered account."
- (b) Please explain what mailers are eligible to establish a "postal administered account."
- (c) Will a PFS customer be able to establish and prefund a postal administered account?
- (d) Will a PFS customer be able to make additional deposits to a postal administered account to accommodate an extended stay at a temporary address? Please explain.
- (e) Does the Postal Service have any plans to permit online applications for PFS and the online payment of PFS? Please explain.
- (f) Please confirm that the "weighing and rating of each [Priority Mail reshipment] package" would consist of the following information: weight, zone (i.e., origin and destination ZIP Code), and rate of postage. If you do not confirm, please explain.

OCA/USPS-T1-24. Please refer to your testimony at pages 3 and 4, concerning "Customer Sign-Up" and "Verification." At any point during customer sign-up and verification, will a PFS customer be given the name, phone number, and other contact

information of the PFS coordinator or other responsible postal employee at the delivery post office that can answer questions and resolve complaints concerning the quality of service provided to the customer? Please explain.

OCA/USPS-T1-25. Please refer to your testimony at pages 3 and 4, concerning "Customer Sign-Up" and "Verification." Will the Postal Service's printed customer information and the oral description of the PFS by window service personnel clearly state the conditions under which non-Priority Mail pieces will be forwarded Priority Mail postage due? If not, please explain.

OCA/USPS-T1-26. Please refer to your testimony at page 5, lines 18-20. Please confirm that the Postal Service will be able to track the PFS Priority Mail reshipment package to each customer. If you do not confirm, please explain.

OCA/USPS-T1-27. The following interrogatories relate to the amount of postage to be affixed to PFS Priority Mail reshipment boxes.

- (a) Will PFS Priority Mail reshipments indicate the appropriate postage for the weight and zone of the box as addressed?
- (b) Will the indicated postage on PFS Priority Mail reshipments be affixed at the postage rate of \$10.00? If so, how will the carrier delivering a PFS box determine that heavier high-zone boxes are not underpaid and warranting postage due?
- (c) Will the indicated postage on PFS Priority Mail reshipments be affixed at the postage rate of \$7.15 which was the assumed average Priority Mail postage in designing the fee for the PFS service? If so, how will the

carrier delivering a PFS box determine the heavier high-zone boxes are not underpaid and warranting postage due?

- (d) If a flat-rate Priority Mail box is used to reship PFS mail, what postage rate will be affixed on the box as postage?

OCA/USPS-T1-28. Please refer to your response to OCA/USPS-T1-7. If a PFS customer wishes to shorten the PFS service and obtain a refund "in accordance with existing procedures" please explain the refund procedure. Please indicate whether the customer may apply for a refund at any post office or, if not, where a refund may be applied for.

OCA/USPS-T1-29. Please provide copies of the marketing information to be made available to the public describing the PFS service and notifying potential PFS customers that non-Priority Mail pieces not fitting into a PFS Priority Mail box will be forwarded postage due at Priority Mail rates.

OCA/USPS-T1-30. Please provide the training instructions and materials that will be used to train window service personnel to insure that potential PFS customers are made aware that non-Priority Mail pieces not fitting into a PFS Priority Mail box will be forwarded postage due at Priority Mail rates.

OCA/USPS-T1-31. Please describe how the Postal Service will determine during the experimental period the number of non-Priority Mail pieces not fitting into a PFS Priority Mail box that are forwarded postage due at Priority Mail rates.

OCA/USPS-T1-32. Please refer to your testimony at page 2, lines 12–16.

- (a) Please confirm that accountable mail also includes Registered Mail; Insured Mail over \$50; Certified Mail; and Return Receipt Requested Mail. If you do not confirm, explain why not.
- (b) Please confirm that, as part of the Premium Forwarding Service (PFS), the following types of “large” packages and parcels would be rerouted immediately, and separately, to the customer’s temporary address without an “additional fee” and without a postage due charge:
1. Package Service with Delivery Confirmation
  2. Package Service with Signature Confirmation
  3. Package Service (merchandise) with Return Receipt
  4. Package Service with insurance over \$50
  5. Standard Mail with Delivery Confirmation
  6. Standard Mail (merchandise) with Return Receipt
  7. Standard Mail with bulk insurance over \$50
  8. First Class with Delivery Confirmation
  9. First Class with Signature Confirmation
  10. First Class with Certified Mail
  11. First Class with Return Receipt Requested
  12. First Class with insurance over \$50
  13. First Class with Registered Mail
- (c) If you do not confirm any part of b., please explain.
- (d) Please refer to the list of package types in part b. of this interrogatory.

- i. What class of mail would be used to send Package Service accountable pieces from the permanent delivery office to the temporary address?
  - ii. What class of mail would be used to send Standard Mail accountable pieces from the permanent delivery office to the temporary address?
  - iii. What class of mail would be used to send First-Class accountable pieces from the permanent delivery office to the temporary address?
- (e) Please confirm that, under PFS, any size Priority Mail piece, whether it fits into the weekly Priority Mail container or not will be rerouted immediately as Priority Mail to the temporary address and that no additional fee or postage due will be assessed. Also confirm that the only exception to this statement is that Priority Mail pieces that do fit into the weekly Priority Mail container will be placed in the container so long as the piece will not be delayed by that action. If you do not confirm either of the questions in this part, please explain.
- (f) Please confirm that, under PFS, any size Express Mail piece, whether it fits into the weekly Priority Mail container or not, will be rerouted immediately as Express Mail to the temporary address and that no additional fee or postage due will be assessed. Also confirm that the only exception to this statement is that Express Mail pieces that do fit into the weekly Priority Mail container will be placed in the container so long as the

piece will not be delayed by that action. If you do not confirm either of the questions in this part, please explain.

OCA/USPS-T1-33. Please refer to your testimony at page 2, lines 12–16. Please confirm that a First-Class package that (1) does not fit into the PFS Priority Mail reshipment, (2) does not require a scan at delivery, and (3) is not treated as accountable mail, will be forwarded as Priority Mail postage due. If you do not confirm, please explain.

OCA/USPS-T1-34. Please explain how a telephone directory (sent as Bound Printed Matter), with dimensions 8.5" x 11" x 4" would be treated under Premium Forwarding Service (PFS).

- (a) Include in your explanation whether such a piece would be considered too large to fit into a weekly Priority Mail container.
- (b) Would such a piece be considered a large parcel or package subject to reshipping as Priority Mail, postage due? Please explain.
- (c) Could a PFS customer refuse such a piece and avoid paying the postage due charge? Explain any negative answer.
- (d) Would the Postal Service suspend PFS service to PFS customers who refuse 1 or more reshipped, postage-due, Priority Mail pieces? Please explain.
- (e) Would a piece such as that described above be placed within a Priority Mail container for reshipping or merely have a Priority Mail label placed over the original mailing label? Please explain.

- (f) We have weighed a telephone directory of the dimensions described above and found that it weighs about 5.5 pounds.
- i. Please confirm that the rate for a single-piece Bound Printed Matter piece weighing not more than 6 pounds mailed to zone 6 is \$3.46. If you do not confirm, please explain.
  - ii. Please confirm that the Priority Mail rate for a telephone directory of similar size and weight mailed to zone 6 would be \$10.05. If you do not confirm, please explain.
- (g) Has the Postal Service considered whether PFS customers will be resentful if they pay postage due charges on packages of slight value that are sent unsolicited? Please explain the Postal Service's rationale for making such mail pieces postage-due Priority Mail in the proposed PFS service.
- (h) What methods will the Postal Service use to make clear to PFS customers that they will be expected to pay for reshipped, postage-due Priority Mail pieces on classes of mail such as Periodicals, Standard Mail, and package services?

OCA/USPS-T1-35. Please give the dimensions of a parcel or package that is considered too large to fit in a weekly Priority Mail container. Explain whether and how the dimensions listed relate to the following DMM provisions:

- (a) C050.3.0 and .1 — Flat-size mail is between 11 ½ and 15 inches long; between 6 1/8 and 12 inches high; and between ¼ and ¾ inches thick.

- (b) C050.4.0 and .1 – Parcels are more than 6 inches long; more than 3 inches high; more than  $\frac{1}{4}$  inch thick; and more than 6 ounces in weight.