

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

EXPERIMENTAL PREMIUM
FORWARDING SERVICE

Docket No. MC2005-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS ARNETTA L. COBB TO INTERROGATORY OF THE
OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS-T3-14(a)-(c)),
REDIRECTED FROM WITNESS ABDIRAHMAN
(January 24, 2005)

The United States Postal Service hereby files the response of witness Arnetta L. Cobb to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T3-14(a)-(c), redirected from witness Abdirahman and filed on January 10, 2004.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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OCA/USPS-T3-14. Please refer to your testimony, revised December 20, 2004, at pages 3-5, referring to the section entitled "B. Per-Shipment Costs."

- (a) Please confirm that for PFS customers, Priority Mail pieces not requiring a scan or otherwise accountable arriving after dispatch on Tuesdays and prior to dispatch of the weekly PFS Priority Mail reshipment piece on Wednesdays would be held for inclusion in the weekly PFS reshipment piece. See response of witness Cobb to OCA/USPS-T1-4. If you do not confirm, please explain.
- (b) Please confirm that the Priority Mail pieces referred to in subpart (a) constitute, on average, one-sixth (i.e., one day per week, Wednesday, divided by six delivery days per week) of Priority Mail pieces received by PFS customers. If you do not confirm, please explain.
- (c) Please confirm that the Priority Mail pieces referred to in subpart (a) would increase the average weight of the weekly PFS Priority Mail reshipment piece. If you do not confirm, please explain.

RESPONSE:

(a) Confirmed for pieces likely to fit into the PFS shipment, with the relevant Tuesday "dispatch" being the latest time that Priority Mail can be forwarded prior to Wednesday, and the relevant Wednesday "dispatch" being the time that the PFS weekly shipment is sent.

(b) Not confirmed. Please see my response to part (a), which states that only those pieces that are likely to fit would be held for inclusion. Thus, starting with the simplified assumption that one-sixth of Priority Mail would be received in the time period described in part (a), not all of that mail would be held for inclusion.

(c) Confirmed that any Priority Mail pieces included in the weekly PFS shipment would increase the shipment's average weight. But I do not expect a significant number of Priority Mail pieces to end up in the weekly PFS shipment. First, households often have control over where Priority Mail is sent, so the Postal Service expects that many PFS customers would have such pieces sent directly to their temporary addresses. Moreover, some of the Priority Mail pieces would

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require scans, and others would not fit in the PFS weekly shipment. Thus, I think that the number of Priority Mail pieces that would be included in the PFS weekly shipment is quite small; as a result, any increase in the average weight of the PFS shipment should be insignificant. The experiment would allow the Postal Service to test its assumptions regarding the weight of the PFS shipments.