

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-1-10
(September 18, 2007)**

The United States Postal Service hereby provides institutional responses to the following interrogatories from David B. Popkin, filed on September 4, 2007: DBP/USPS-1-10.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Kenneth N. Hollies
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083; Fax -3084
khollies@usps.gov

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

DBP/USPS-1: For purposes of this Interrogatory, assume that I sign up at the Englewood NJ post office on February 1, 2007, for Premium Forwarding Service for ten weeks of forwarding the mail arriving at my Englewood NJ address starting on Wednesday, February 7, 2007, and ending on Wednesday, April 11, 2007, to an address in Boca Raton FL. Further assume that on Friday, March 9, 2007, I find it necessary to move from my address in Boca Raton, FL to a new address in Tampa, FL.

- (a) Please describe each of the methods (if any) that I may utilize to ensure that the March 14, 2007, mailing will be received at my address in Tampa, FL including any additional fees that will be required.
- (b) Please describe each of the methods (if any) that I may utilize to ensure that the March 21 through April 11, 2007, mailings will be received at my address in Tampa, FL including any additional fees that will be required.
- (c) Will I be permitted to file a Change of Address Order at the Boca Raton FL post office to have my Premium Forwarding Service mailings forwarded to my new address in Tampa, FL? Please advise if there are any additional Premium Forwarding Service fees involved.
- (d) If not, why not?
- (e) Will I be permitted to file a Change of Address Order at the Boca Raton FL post office to have all of my mail that arrives directly (other than the Premium Forwarding Service mailings) at my Boca Raton, FL address forwarded to my new address in Tampa, FL?
- (f) If not, why not?
- (g) If I call the Englewood NJ post office on the telephone on Friday, March 9, 2007, and advise them of the move later that day from Boca Raton FL to Tampa FL and ask them to start forwarding my mail starting on Wednesday, March 14, 2007 to my new address in Tampa FL, what should I be advised by the Englewood NJ post office? Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.
- (h) If I send a signed statement by facsimile to the Englewood NJ post office on Friday, March 9, 2007, and advise them of the move later that day from Boca Raton FL to Tampa FL and ask them to start forwarding my mail starting on Wednesday, March 14, 2007 to my new address in Tampa FL, what action should the Englewood NJ post office take with respect to my signed facsimile request? Please provide two separate answers based on whether I do and do not provide them with a telephone number in my request. Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.
- (i) If I send a signed letter to the Englewood NJ post office on Friday, March 9, 2007, which is received on Monday, March 12, 2007, and advise them of the move later that day from Boca Raton FL to Tampa FL and ask them to start forwarding my mail starting on Wednesday, March 14, 2007 to my new address in Tampa FL, what action should the Englewood NJ post office take with respect to my signed letter request? Please provide two separate answers based on whether I do and do not provide them with a telephone number in my request.

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

Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.

- (j) If I call the Boca Raton FL post office on the telephone on Friday, March 9, 2007, and advise them of the move later that day from Boca Raton FL to Tampa FL and ask them how I can have the address of my Premium Forwarding Service changed starting on Wednesday, March 14, 2007 to my new address in Tampa FL, what should I be advised by the Boca Raton FL post office? Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.
- (k) If I call the Tampa FL post office on the telephone on Friday, March 9, 2007, and advise them of the move earlier that day from Boca Raton FL to Tampa FL and ask them how I can have the address of my Premium Forwarding Service changed starting on Wednesday, March 14, 2007 to my new address in Tampa FL, what should I be advised by the Tampa FL post office? Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.
- (l) If I visit the Boca Raton FL post office in person on Friday, March 9, 2007, and advise them of the move later that day from Boca Raton FL to Tampa FL and ask them how I can have the address of my Premium Forwarding Service changed starting on Wednesday, March 14, 2007 to my new address in Tampa FL, what should I be advised by the Boca Raton FL post office? Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.
- (m) If I visit the Tampa FL post office in person on Friday, March 9, 2007, and advise them of the move earlier that day from Boca Raton FL to Tampa FL and ask them how I can have the address of my Premium Forwarding Service changed starting on Wednesday, March 14, 2007 to my new address in Tampa FL, what should I be advised by the Tampa FL post office? Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.
- (n) Please advise the level of satisfaction that you believe a PFS customer will have with the various responses received in the previous subparts of this Interrogatory,

RESPONSE:

For purposes of this response, we assume that the mail about which inquiry is made has not been delivered by the Post Office serving the customer's primary address, but has been received by that office for processing pursuant to the direction of a Premium Forwarding Service (PFS) customer. Further, we assume that PFS shipments entail a single mail piece and that no outside pieces (reshipped individually) are involved. See also, the response to DBP/USPS-9. The various parts of this interrogatory illustrate why

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

one cannot establish policy that covers all possible fact situations; policy can only define a foundation upon which an employee relies when exercising her own best judgment regarding each situation's facts.

(a-b) Under the current guidelines for PFS, each PFS application filed in person at the Post Office serving a customer's permanent address (or Post Office box) applies to a single temporary address. A customer may terminate service early and obtain a refund of the unused portion of prepaid weekly shipment charges. There is no way to "ensure" that a PFS shipment would go to a second temporary address unless a separate PFS application and fee have been filed and verified at the Post Office serving a customer's primary address. Payment of the application fee and at least two weekly shipment fees would be necessary. (See witness Hope's testimony, USPS-T-1, page 9 lines 13 -14.) As such, current PFS service is not designed to meet the requirements of this hypothetical very well. The intent of the current docket is to establish PFS, in the form it has been offered experimentally for the past two years, as a permanent service. While the Postal Service expects that PFS will evolve as customer needs are identified and responses are developed, this docket entails no such development.

(c-d) PFS shipments cannot be forwarded using a COA. This hypothetical is not compatible with the PFS operational guidelines; as such, no costs underlying this scenario are accounted for in the development of the pricing structure for PFS. Further, under COA, only some classes of mail are forwarded (e.g., First-Class Mail, some Periodicals).

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

(e) Yes, a COA for forwardable mail received in Boca Raton can be filed. Some classes of mail would be forwarded on a piece-by-piece basis, not including PFS pieces.

(f) N/A

(g) See the responses to parts (a-b), above, and (h-m), below. The elements included in the hypothetical are not addressed by current PFS operational guidelines, so any answer on the telephone would be based, in part, on the knowledge and information available to the telephone correspondent. As such, it may be possible to cancel PFS; if so then Hold Mail service or a temporary COA could conceivably follow pursuant to requirements for those options.

(h-m) These fact laden hypothetical questions (including part (g), above) illustrate how and why formal regulations and policies can never address all possible situations. The nature of the response could well depend, for example, on whether the retail clerk, or telephone/fax correspondent, recognizes an individual customer, her voice, or her handwriting, and the content of any face-to-face, telephonic or fax communication. However, to whatever extent these questions address PFS, the implications are covered in other responses above.

(n) The Postal Service has never measured customer satisfaction regarding responses to written cross-examination in litigation; nor has any need or interest in doing so ever been identified. Notwithstanding, PFS is quite popular with customers and employees. The growth of PFS indicates that the service is gaining traction with customers. Feedback from postal employees involved with PFS across the country as well as qualitative comments from many customers further support this view.

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

That said, the Postal Service is always looking, in conformity with good business practice, to increase the value of services to customers. Witness Hope's testimony states (USPS-T-1, page 9, lines 14-17), "While PFS remains a manual service at this time, the Postal Service would like to build and leverage technology tools that might enhance and simplify a PFS customer's use of the service when time and other resources permit." In this context, the Postal Service will continue to explore online registration options and other enhancements to PFS. Business decisions on PFS enhancements will be based on many considerations, including: return on investment, revenue potential and profitability, accessibility, and overall customer satisfaction.

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

DBP/USPS-2: For purposes of this Interrogatory, assume that I sign up at the Englewood NJ post office on February 1, 2007, for Premium Forwarding Service for ten weeks of forwarding the mail arriving at my Englewood NJ address starting on Wednesday, February 7, 2007, and ending on Wednesday, April 11, 2007, to an address in Boca Raton FL. Further assume that on Friday, March 9, 2007, I find it necessary to return home making several stops enroute so that I arrive back in Englewood NJ on Thursday, March 15, 2007.

- (a) Please describe each of the methods (if any) that I may utilize to ensure that the March 14, 2007, mailing will not be made including any additional fees that will be required or refunds available.
- (b) Please describe each of the methods (if any) that I may utilize to ensure that the March 21 through April 11, 2007, mailings will not be made including any additional fees that will be required or refunds available.
- (c) Will I be permitted to file a Change of Address Order at the Boca Raton FL post office to have my Premium Forwarding Service mailings forwarded to my permanent address in Englewood NJ? Please advise if there are any additional Premium Forwarding Service fees involved.
- (d) If not, why not?
- (e) Will I be permitted to file a Change of Address Order at the Boca Raton FL post office to have all of my mail that arrives directly (other than the Premium Forwarding Service mailings) at my Boca Raton, FL address forwarded to my permanent address in Englewood, NJ?
- (f) If not, why not?
- (g) If I call the Englewood NJ post office on the telephone on Friday, March 9, 2007, and advise them of the return to my permanent address in Englewood NJ and ask them not to make the March 14th mailing, what should I be advised by the Englewood NJ post office. Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees or refunds involved.
- (h) If I send a signed statement by facsimile to the Englewood NJ post office on Friday, March 9, 2007, and advise them of the return to my permanent address in Englewood NJ and ask them to stop forwarding my mail starting on Wednesday, March 14, 2007, what action should the Englewood NJ post office take with respect to my signed facsimile request? Please provide two separate answers based on whether I do and do not provide them with a telephone number in my request. Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees or refunds involved.
- (i) If I mail a signed statement to the Englewood NJ post office on Friday, March 9, 2007, which is received on Monday, March 12, 2007, and advise them of the return to my permanent address in Englewood NJ and ask them to stop forwarding my mail starting on Wednesday, March 14, 2007, what action should the Englewood NJ post office take with respect to my signed letter request? Please provide two separate answers based on whether I do and do not provide them with a telephone number in my request. Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees or refunds involved.

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

- (j) If I call the Boca Raton FL post office on the telephone on Friday, March 9, 2007, and advise them of the return to my permanent address in Englewood NJ and ask them how I can stop my Premium Forwarding Service shipments starting on Wednesday, March 14, 2007, what should I be advised by the Boca Raton FL post office? Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees or refunds involved.
- (k) If I visit the Boca Raton FL post office in person on Friday, March 9, 2007, and advise them of the return to my permanent address in Englewood NJ and ask them how I can stop my Premium Forwarding Service shipments starting on Wednesday, March 14, 2007, what should I be advised by the Boca Raton FL post office? Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees or refunds involved.
- (l) Please advise the level of satisfaction that you believe a PFS customer will have with the various responses received in the previous subparts of this Interrogatory,

RESPONSE:

For purposes of this response, some simplifying assumptions are necessary before responding to respective parts. We assume that the mail about which inquiry is made has not been delivered by the Post Office serving the customer's primary address, but has been received by that office for processing pursuant to the direction of a Premium Forwarding Service (PFS) customer. Further, we assume that PFS shipments entail a single mail piece and that no outside pieces (reshipped individually) are involved. The responses to DBP/USPS-1 are also relevant here to parallel questions herein, for limits on what policy can address, and for the possible implications of what an employee already knows or learns from communicating (by whatever method) with a customer. Finally, postal employees are dedicated public servants who often go above and beyond the usual call to duty when dealing with a customer's unique difficulties, which means that answers can often be found for problems not addressed in standard policies or procedures. See also, the response to DBP/USPS-9.

(a-b) Each PFS customer must inform a primary Post Office when PFS shipments should stop. Policy does not specify how this may be accomplished after the filing of an

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

application, when each PFS customer learns what is necessary to prove identity and primary address and first establishes the termination date. Postal employees are careful about the security of a customer's mail, so responses would depend upon the totality of unique circumstances inherent in each communication. A customer may request a refund for any unused PFS weekly reshipment charges. The application fee is not refundable. To request a refund, a customer must complete PS Form 3533 and present a valid government photo ID at the Post Office serving that customer's primary address.

(c-e) No. See the responses to DPB/USPS-1(c-e).

(f) N/A

(g-k) See the responses to DBP/USPS-1(a-b, h-m).

(l) See the response to DBP/USPS-1(n).

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

DBP/USPS-3: For purposes of this Interrogatory, assume that I sign up at the Englewood NJ post office on February 1, 2007, for Premium Forwarding Service for ten weeks of forwarding the mail arriving at my Englewood NJ address starting on Wednesday, February 7, 2007, and ending on Wednesday, April 11, 2007, to an address in Boca Raton FL. Further assume that on Friday, April 13, 2007, I find that I will be remaining in Florida longer than I expected and I desire that two additional shipments be made on Wednesday, April 18 and 25, 2007.

- (a) Please describe each of the methods (if any) that I may utilize to obtain the two additional shipments on Wednesday, April 18 and 25, 2007, including any additional fees that will be required.
- (b) Will I be permitted to file a Change of Address Order at the Englewood NJ post office to have my mail received after the final scheduled PFS shipment on Wednesday, April 11, 2007, forwarded to my temporary Boca Raton FL address?
- (c) If not, why not?
- (d) If I call the Englewood NJ post office on the telephone on Friday, April 6 or 13, 2007, (the April 6th date was chosen as being before the last scheduled shipment date of April 11, 2007 while the April 13th date was chosen as being after the last scheduled shipment date but prior to the desired additional shipment dates - please provide separate answers if there is a different response) and advise them need for two additional weeks of PFS service, what should I be advised by the Englewood NJ post office? Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.
- (e) If I send a signed statement by facsimile to the Englewood NJ post office on Friday, April 6 or 13, 2007, (the April 6th date was chosen as being before the last scheduled shipment date of April 11, 2007 while the April 13th date was chosen as being after the last scheduled shipment date but prior to the desired additional shipment dates - please provide separate answers if there is a different response) and advise them need for two additional weeks of PFS service, what action should the Englewood NJ post office take with respect to my signed facsimile request? Please provide two separate answers based on whether I do and do not provide them with a telephone number in my request. Please also provide separate responses if I include credit card data in my request. Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.
- (f) If I send a signed letter to the Englewood NJ post office on Friday, April 6 or 13, 2007, (the April 6th date was chosen as being before the last scheduled shipment date of April 11, 2007 while the April 13th date was chosen as being after the last scheduled shipment date but prior to the desired additional shipment dates - please provide separate answers if there is a different response) and advise them need for two additional weeks of PFS service, what action should the Englewood NJ post office take with respect to my signed letter request? Please provide two separate answers based on whether I do and do not provide them with a telephone number in my request. Please also provide separate responses if I include credit card data or enclose a check for the required amount in my request. Please explain the rationale for the response

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

given. Please advise if there are any additional Premium Forwarding Service fees involved.

- (g) If I call the Boca Raton FL post office on the telephone on Friday, April 6 or 13, 2007, (the April 6th date was chosen as being before the last scheduled shipment date of April 11, 2007 while the April 13th date was chosen as being after the last scheduled shipment date but prior to the desired additional shipment dates - please provide separate answers if there is a different response) and advise them need for two additional weeks of PFS service, what action should I be advised by the Boca Raton FL post office? Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.
- (h) If I visit the Boca Raton FL post office in person on Friday, April 6 or 13, 2007, (the April 6th date was chosen as being before the last scheduled shipment date of April 11, 2007 while the April 13th date was chosen as being after the last scheduled shipment date but prior to the desired additional shipment dates - please provide separate answers if there is a different response) and advise them need for two additional weeks of PFS service, what action should I be advised by the Boca Raton FL post office? Please explain the rationale for the response given. Please advise if there are any additional Premium Forwarding Service fees involved.
- (i) Please advise the level of satisfaction that you believe a PFS customer will have with the various responses received in the previous subparts of this Interrogatory,

RESPONSE:

For purposes of this response, some simplifying assumptions are necessary before responding to respective parts. We assume that the mail about which inquiry is made has not been delivered by the Post Office serving the customer's primary address, but has been received by that office for processing pursuant to the direction of a Premium Forwarding Service (PFS) customer. Further, we assume that PFS shipments entail a single mail piece and that no outside pieces (reshipped individually) are involved.

Please also see the responses to DBP/USPS-1-2, since these answers largely parallel those. Finally, see also the response to DBP/USPS-9.

- (a) Since the last shipment date for PFS has already occurred, postal policy would require this customer to file a new application, with attendant application and weekly fees. The previous period of service could not be extended.

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

- (b) Yes, as long as the COA meets the minimum stated period.
- (c) N/A.
- (d-h) See the responses to DBP/USPS-1(a-b, h-m) and the first paragraph of the response to DBP/USPS-2. Postmasters (or designees) at the customer's primary Post Office routinely deal with a customer's unique needs. On April 6, PFS can still be extended (since the term of service is still active) if the additional weekly shipment charges are paid at the primary Post Office. On April 13, the PFS application would have expired and cannot be extended. See also the response to part (a), above.
- (i) See the response to DPB/USPS-1(n).

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

DBP/USPS-4:

- (a) Please advise the various methods by which a customer may file a Change of Address Order.
- (b) For each of the methods provided in response to subpart a, please provide the number of transactions in a recent year-long period that were conducted by that method.
- (c) For each of the methods provided in response to subpart a, please advise whether the transaction must be completed in person at the post office from which the mail is being forwarded.
- (d) For each of the methods provided in response to subpart a, please advise whether the transaction must be completed in person at any post office.
- (e) For each of the methods provided in response to subpart a, please advise whether the transaction may be completed on line.
- (f) For each of the methods provided in response to subpart a, please advise whether the transaction may be completed completely by mail.
- (g) For each of the methods provided in response to subpart a, please provide a complete discussion of the methods that are utilized by the Postal Service to ensure the authenticity of the request.
- (h) For each of the methods provided in response to subpart a, please provide the number of complaints that were received in that year about the submission of fraudulent requests.

RESPONSE:

(a) Customers may file a Change of Address order (COA) by one of three methods: PS Form 3575 (hardcopy card), Internet Change of Address (ICOA), and Telephone Change of Address (TCOA).

(b) In FY06, the number of changes of address filed by method of entry was:

PS Form 3575: 36,818,777

Internet: 4,529,007

Telephone: 124,187

(c-d) No method requires a personal appearance.

(e) The Internet option requires completion online.

(f) Hardcopy PS Form 3575 must be submitted to the Postal Service, which is possible by mail. However, as explained below, that act alone does not operate to make a COA operative.

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

(g) Authentication methods include the following:

- *A Move Validation Letter* is always sent to the old address describing the content of the Change of Address order. *A Customer Notification Letter* is always sent to the new address also describing the Change of Address order. Both letters tell the recipient to call 1-800-USPS immediately if there is any problem.
- ICOA and TCOA require a credit card.
- PS Form 3575 requires a signature.

(h) In FY06, the number of complaints received was 228:

PS Form 3575:	79
ICOA:	144
TCOA:	1
Third Party:	4

(A "Third Party" is an authorized agent for an addressee.)

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

DBP/USPS-5:

- (a) Please confirm, or explain if you are unable to confirm, that all transactions for Premium Forwarding Service must be conducted in person at the post office serving the primary local address of the customer. This includes the original request plus any need to modify or terminate an outstanding request.
- (b) Please provide a complete discussion of the methods that are utilized by the Postal Service to ensure the authenticity of the PFS request.
- (c) Please provide the number of complaints that were received in a recent year-long period about the submission of fraudulent PFS requests.
- (d) For each of the methods by which a customer may file or modify a Change of Address Order but by which a Premium Forwarding Service request may not be conducted, please provide all of the reasons as to why Premium Forwarding Service may not be conducted by that means.
- (e) Does the Postal Service believe that there is or may be a need for expanding the methods by which a customer may sign up for PFS or modify an existing order?
- (f) If so, please explain why these needs are not being met in the current proposal.
- (g) If not, why not?

RESPONSE:

Please refer to the response to DBP/USPS-9 which explains why a personal appearance is required.

- (a) Confirmed that current policy requires a personal appearance to apply for PFS. Also, commensurate with the requirements that a PFS applicant must prove identity and primary address. Because the Postal Service understands mail security to be of critical importance, policy specifies that a customer who wants to change the term of her existing PFS does need to make a personal appearance. The most common such change is when a customer goes to the Post Office to terminate PFS after returning home earlier than first projected; a customer might also pick up accumulated mail and apply for a refund during that visit. The responses to DBP/USPS-1 and –2 also indicate how policy may not cover every possible situation.
- (b) Customers must provide valid identification (ID) when applying for PFS. A customer must provide photo identification and proof of her primary residential address. Postal Service personnel are required to verify the customer's identity and primary

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

address with a driver's license, passport, or any type of government-issued ID. Credit cards and IDs issued by private companies are not acceptable forms of photo ID. The box section clerk or carrier to whom a processed PFS application is given also provides a measure of security since she would usually recognize that an applicant normally receives mail through a specific Post Office box or at a particular primary address.

(c) No such examples have been identified, thereby validating the current PFS procedures.

(d) This question implicitly – and incorrectly – postulates the direct comparability of PFS and Change of Address orders. They are two different services with quite different histories and requirements. As PFS grows and matures, it may offer additional access channels as reflected in the testimonies of witnesses Hope (USPS-T-1) and Dawson (USPS-T-3). Changes of Address orders have been processed for many, many decades, and the options available for processing them reflect that service's maturity.

(e-g) The current proposal seeks only to make permanent the form of PFS now offered as an experiment. See also, the responses to DBP/USPS-1(n), DBP/USPS-2, and DBP/USPS-9; and USPS-T-3, at 11..

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

DBP/USPS-6:

- (a) Please provide the results of the survey that was provided as Attachment 4 to USPS-T-1.
- (b) Please advise how many surveys were distributed and how the recipients of the survey were chosen.
- (c) Question 14 of this survey indicates the potential for signing up for PFS on the Internet. Why wasn't Internet signup made a part of the current request?
- (d) Would Internet signup require an expenditure of additional funds? If so, quantify the amount and indicate the time period over which it would be expended.

RESPONSE:

(a) Results of questions 2 - 8 and 11 - 14 were provided in response to OCA/USPS-T1-4. Responses to the remaining questions that were tallied (1, 9, and 10) from the qualitative survey administered by the Postal Service's Office of the Consumer Advocate are summarized below.

Question 1:

"How many times have you requested U.S. Postal Service Premium Forwarding Service?"

One time	63
Two times	59
Three times	34
Four times	11
Five times	5
Six times	3
More than six times	26
Don't know	4

Question 9:

"At the time you enrolled in Premium Forwarding Service, did you receive an explanation of the potential need to pay additional postage for shipping of certain types of mail (Parcel Post, Media Mail, Bound Printed Matter, Library Mail, or Standard Mail) that could not fit in the weekly shipment?"

Yes	66
No	101
Don't Know	31

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

Question 10:

“Have you received any mail at your temporary address for which you had to pay additional postage (postage other than the \$10.40 per weekly shipment)?

Yes	9
No	186
Don't Know	5

- (b) See witness Hope’s testimony, USPS-T-1, p. 10, lines 1-4.
- (c) See the responses to DBP/USPS-1(n), DPB/USPS-5(e-g), and DBP/USPS-9.
- (d) No quantification is available, although substantial investment would be necessary. A potential internet sign-up solution has not been fully designed; total cost would depend on its parameters as well as the current and future operating environments. See also the response to DBP/USPS-7(b).

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

DBP/USPS-7:

- (a) Question 22 of the PFS Application Form PS Form 8176 asks if a customer would prefer to enroll in the program using the Internet and by Telephone. Please advise the results of this survey question.
- (b) Would Telephone signup require an expenditure of additional funds? If so, quantify the amount and indicate the time period over which it would be expended.

RESPONSE:

- (a) These results were not tallied.
- (b) Yes. Development of a telephony registration system, interface or other communication function would incur various costs. No details are currently available, although one now outdated estimate for a tool that would not have required a personal appearance at the Post Office serving a PFS customer's primary address amounted to several hundreds of thousands of dollars. If such development is undertaken, it would likely be as part of a remote registration process for PFS. See also the response to DBP/USPS-6(d).

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

DBP/USPS-8:

- (a) Question 20 of the PFS Application Form PS Form 8176 requires the type of Government-issued Photo ID be *[sic]* recorded. Please explain why the number of the ID is not recorded.
- (b) Please confirm, or explain if you are unable to confirm, that the presentation of a Government-issued Photo ID is not required for the submission of a Change of Address Order.
- (c) Please confirm, or explain if you are unable to confirm, that the Change of Address request and the PFS request provide the same basic service, even though it obviously is under different conditions, namely, to forward a customer's mail to a new address.
- (d) Please advise why the Postal Service believes that a greater level of security, namely, making the request in person at the local post office and presenting a Government-issued Photo ID card, is required for PFS but not for a Change of Address request.

RESPONSE:

(a) No need for the collection of ID numbers has been identified. Absent such a requirement, the Postal Service's endemic interest in protecting the privacy interests of its customers leads it to avoid collecting such information.

(b) Confirmed. For Change of Address service, validation is handled differently. See the response to DBP/USPS-4(g). These procedures are not applicable to PFS as proposed in this docket; instead, it has its own validation protocol.

(c) Not confirmed. PFS and Change of Address are different services with different histories and requirements. See also, the response to DBP/USPS-5(d).

Notwithstanding, both COA and PFS do involve customer addresses.

(d) As reflected in response to parts (b-c), the response to DBP/USPS-9 and elsewhere, the validation process for PFS satisfies requirements applicable to its current state of development. The simple form of PFS tested experimentally relies upon manual processes at the Post Office serving a customer's primary residential address and has proven that it works to the satisfaction of both customers and employees; it is accordingly now being made a permanent service. How its requirements may change

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

in the future will be evaluated contemporaneously with its future development. The Postal Service does not agree that one service is necessarily more secure than another, although it is clear that one is more mature than the other.

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

DBP/USPS-9:

- (a) Please advise why the PFS enrollment must be completed at the post office serving the primary local address as opposed to being made at any post office.
- (b) Please confirm, or explain if you are unable to confirm, that the PFS request may be made at any station or branch of the post office serving the primary local address.
- (c) Please confirm, or explain if you are unable to confirm, that if a PFS request is made at station or branch that did not serve the PFS customer that the form would be forwarded to the branch or station that did.
- (d) Please explain the difference between the employee at the Fort George Station of the New York NY post office (10040) forwarding the PFS application to the Village Station of the New York NY post office (10014) and between the employee at the Tenafly NJ post office (07670) forwarding the PFS application to the Englewood NJ post office (07631).
- (e) Please confirm, or explain if you are unable to confirm, that if a customer had a Change of Address order requesting to forward the mail from Englewood NJ to Boca Raton FL and delivered that request to the Tenafly NJ post office, the Tenafly post office would forward the form to the Englewood post office.
- (f) Why can't the same procedure take place with the PFS application?

RESPONSE:

(a-f) PFS was designed for maximum efficiency and least cost. Since it replaced unauthorized and costly variants of "Snowbird" service (for which some customers were charged little or not at all), low prices were critical to acceptance of PFS. The pending proposal retains this narrow focus cost by making an experimental service permanent while acknowledging and facilitating future developments. 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. 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. Postal Service management

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

may well look at mature Change of Address processes when evaluating systemic improvement for PFS.

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

DBP/USPS-10:

Please confirm, or explain if you are unable to confirm, that it is the belief of the Inspection Service that if an individual wanted to submit a fraudulent request to change the address for someone's mail that they would be more likely to utilize a system that was free (filing a Change of Address Order) as opposed to one that required paying a fee (PFS).

RESPONSE:

Unable to confirm. This question makes assumptions about the comparability of PFS and Change of Address for purposes of fraudulent intent and the relative ease and proposed cost of respective hypothetical crimes, compounded by the Inspection Service's apperception of criminal intent in each context. The hypothetical supplies no information on risk to the Postal Service, a customer, or a criminal, nor as to any fruits of the respective crimes. The Postal Service would agree that mail security is important, and that Change of Address service and PFS both require that attention be paid to mail security implications. However, we are unable to reach any conclusion of the type this question requests.