

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

PREMIUM FORWARDING SERVICE

DOCKET NO. MC2007-3

REPLY BRIEF OF DAVID B. POPKIN

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Respectfully submitted,

MC20073REPLYBRIEF

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In their Initial Brief¹ the Postal Service states that they believe that they have addressed my concerns by eliminating the DMCS requirement that customers submit a Premium Forwarding Service [PFS] application to the Post Office serving the customer's primary address. While the elimination of this requirement from the DMCS will allow the Postal Service at some time in the future to permit PFS applications to be filed at other than the Post Office serving the customer's primary address, it is still their intention in the instant Docket to require PFS applications to be filed at the Post Office serving the customer's primary address².

The OCA in their Initial Brief³ discusses the potential for implementing online registration for PFS. While online registration might be considered the ultimate solution, it still may incur a cost which can not be justified for the size of the PFS program. However, there are other potential solutions which will solve the problem and not incur significant costs. It is as simple as allowing customers to complete the PFS application or other action at any post office and have that post office validate the application and

¹ USPS Initial Brief at 2.

² It may also be conducted in person at a station or branch of the post office that serves the customer's permanent address.

³ OCA Initial Brief at 5.

forward it to the appropriate post office for action. This will incur a negligible added cost.

This would be similar to the procedure that already is in existence with applying for a post office box as noted in following DMM Sections 508.4.3.1.a and 508.4.3.2 [underlining has been added for emphasis]

4.3.1 Application

Procedures for applying for post office box service are as follows:

- a. The applicant must complete all required items on Form 1093, *Application for Post Office Box or Caller Service*, and submit it to any postal facility that provides window service to the public. The facility need not be the one where box service is desired. Furnishing false information on the application or refusing to furnish required information may be sufficient reason for denial of the application or discontinuance of service.

4.3.2 Verification

An application for post office box service may not be approved until the applicant's identity and current permanent physical address where he or she resides or conducts business is verified. Verification criteria are as follows:

- a. At the time of application, applicants must present two items of valid identification; one item must contain a photograph of the applicant. Social Security cards or credit cards and birth certificates are unacceptable as identification. The following are acceptable identification:
 1. Valid driver's license or state non-driver's identification card.
 2. Armed forces, government, university, or recognized corporate identification card.
 3. Passport, alien registration card, or certificate of naturalization.
 4. Current lease, mortgage, or deed of trust.
 5. Voter or vehicle registration card.
 6. Home or vehicle insurance policy.
- b. The identification presented must be current. It must contain sufficient information to confirm that the applicant is who he or she claims to be and must be traceable to the bearer.

For the reasons stated, 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.