

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

CONFIRM

Docket No. MC2002-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS BAKSHI TO INTERROGATORIES OF OFFICE OF THE CONSUMER  
ADVOCATE  
(OCA/USPS-T1-1-18)

The United States Postal Service hereby provides the responses of witness Bakshi to the following interrogatories of Office of the Consumer Advocate: OCA/USPS-T1-1-18, filed on May 1, 2002.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Joseph K. Moore

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May 15, 2002

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**OCA/USPS-1.** The following questions refer to the USPS's capability to capture PLANET Code data.

- a. At page 4 of your testimony, you indicate that a "Confirm® data record is generated each time the PLANET Coded mail piece is run on certain Postal Service automated mail processing equipment." Please identify all automated mail processing equipment that can currently capture PLANET Code data.
- b. Are all USPS mail processing sites capable of capturing origination and destination PLANET Code data?
- c. If your response to part "b" of this interrogatory is other than affirmative, please identify all facilities that are unable to capture PLANET Code data. Include in your response the type of USPS facility listed – i.e. P&DC, AMF, BMC, SCF, etc.
- d. If your response to part "b" of this interrogatory is other than affirmative, please identify all 5-digit ZIP Code areas that are impacted by the inability of the USPS to capture PLANET Code data.
- e. Assume a hypothetical PLANET Coded letter is entered into the Postal System at a P&DC facility as a destination Confirm® mail piece. The destination of the hypothetical letter is a household outside of the delivery area of the entry point P&DC. Please identify the number of scans the mail piece is likely to receive by "certain USPS automated equipment" as well as the number of Confirm® records the hypothetical letter will generate.
- f. The following refers to Business Reply mail pieces. Please provide an estimate of the number of scans the average destination Confirm® Business Reply mail piece is likely to receive. If you are unable to provide an estimate, please explain.

**RESPONSE:**

- a. The machines capable of reading a PLANET barcode include DBCS, DBCS/OSS, DBCS/OCR, DBCS/TEST, DIOSS, MPBCS, MPBCS/OSS, OSS/TEST, CSBCS, AFSM100, FSM1000, and FSM881.
- b. No. The primary exceptions are international mail sites and new annexes (see response to 1c below).

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c. At the following sites, the identified equipment delivers no PLANET codes due to the lack of connectivity equipment:

Farmington Annex, MO	2 CSBCS
Globe Annex, AZ	3 CSBCS
Dallas International Service Center	1 DBCS, 1 FSM881
Bullhead City Annex, AZ	1 DBCS
Yuma, AZ	1 DBCS

d. The sites identified in 1c are all either small annexes or an international service center. Affected 5-digit ZIP Codes include:

- Farmington Annex, MO 64640 processes for ZIP Codes 64640-63640
- Globe Annex, AZ 85501 processes for ZIPs 85501, 85502, 85546, 85548, 85532
- Dallas International Service Center 76155 processes incoming or outgoing international mail for the SW area.
- Bullhead City, AZ 86442- There are two facilities within the same ZIP Code, a post office (PO) and an annex. The two facilities are within a block of each other. The PO processes for 86439. The Annex processes for 86426, 86429, 86442
- Yuma, AZ 85365- This is a post office that processes mail for 85364, 85365, 83566, 83569.

e. The number of scans varies depending on variables such as presort level, ZIP Code, etc. However, a typical piece would receive about 3 scans.

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f. The number of scans received by a Business Reply Mail (BRM) piece depends on its origin-destination characteristics, and the number of sorts needed to finalize the piece for delivery. There is no estimate of how many scans the “average” BRM piece that is participating in Confirm will receive. See response to OCA/USPS-T1-1(e) for a general discussion of scans per piece for destination Confirm pieces.

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**OCA/USPS-2.** The following questions refer to those facilities that are currently capable of capturing PLANET Code data.

- a. For all USPS mail processing sites that are capable of capturing PLANET Code data, how many are actually capturing the data?
- b. Please identify all mail processing sites that are capable of capturing PLANET Code data, but are not currently doing so.
- c. For each site identified in part “b” of this interrogatory, please identify all 5-digit ZIP Codes impacted.
- d. For each site identified in part “b” of this interrogatory, explain why the site is not currently capturing PLANET Code data. Please include in your response, the expected date upon which each site will begin capturing PLANET Code data.

**RESPONSE:**

- a. See response to 1(c) above. For existing mail processing equipment, answer 1c identifies those sites and equipment not presently capable of delivering PLANET codes because of either site connectivity or lack of communications equipment. All other operating MPE equipment communicate PLANET Codes.
- b. None.
- c. N/A.
- d. N/A.

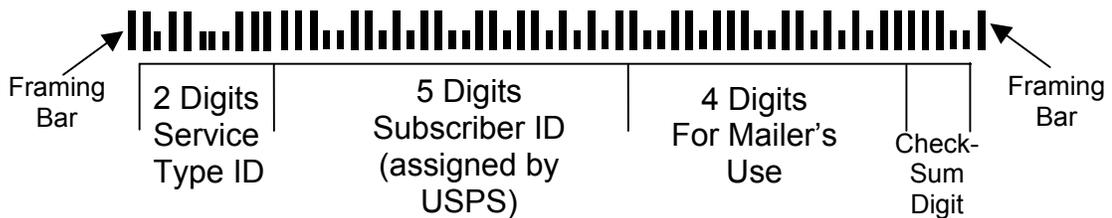
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**OCA/USPS-3.** Please provide a sample copy of a PLANET Code barcode. Are the data values used in a PLANET Code limited to numeric values? If not, please explain the types of data values permitted.

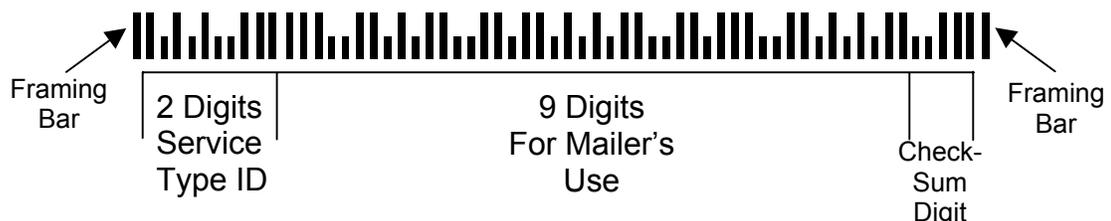
**RESPONSE:**

The PLANET Code consists of a total of 12 digits, including a check-sum digit that helps Postal Service detect errors. The PLANET Code structures for both Destination and Origin Confirm are exemplified in the diagrams below.

### PLANET Code for Destination Confirm



### PLANET Code for Origin Confirm



Each PLANET Code digit is represented by a combination of five bars: three tall bars and two short bars. Each combination represents a numeric value only.



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**OCA/USPS-5.** Your testimony at page 4 indicates that in October 1, 2001, the Postal Service began requiring mailers to submit an Advanced Shipping Notice (ASN) prior to or at the time of entering Destination Confirm® mailings.

- a. Please identify the process mailers used prior to October 1, 2001, and include all types of information previously gathered by the USPS.
- b. You indicate that the USPS requirement to use the ASN prior to or in conjunction with a Confirm® mailing allowed a new feature that enabled specific types of performance measurement and troubleshooting information to be provided. Please explain what the new performance and troubleshooting information is and to whom the information is provided.

**RESPONSE:**

- a. Prior to October 1, 2001, mailers only provided information to the Postal Service when they applied to the program. At that time, mailers completed and submitted a Confirm application, along with some sample mail pieces containing PLANET Codes for testing. After the application was processed and the sample pieces approved, the Postal Service “activated” the mailer’s Confirm account. Mailers were then free to begin Confirm mailings and start receiving data. No further information was required from mailers thereafter.
- b. A reporting feature is now available for Confirm subscribers at the Confirm website, [www.planetcodes.com](http://www.planetcodes.com). The reports consist of characteristics about their mail only and are presented in a “shared” format so designated postal representatives can have informed discussions with subscribers in order to address mail performance issues. See *also* the response to OCA/USPS-T1-8.

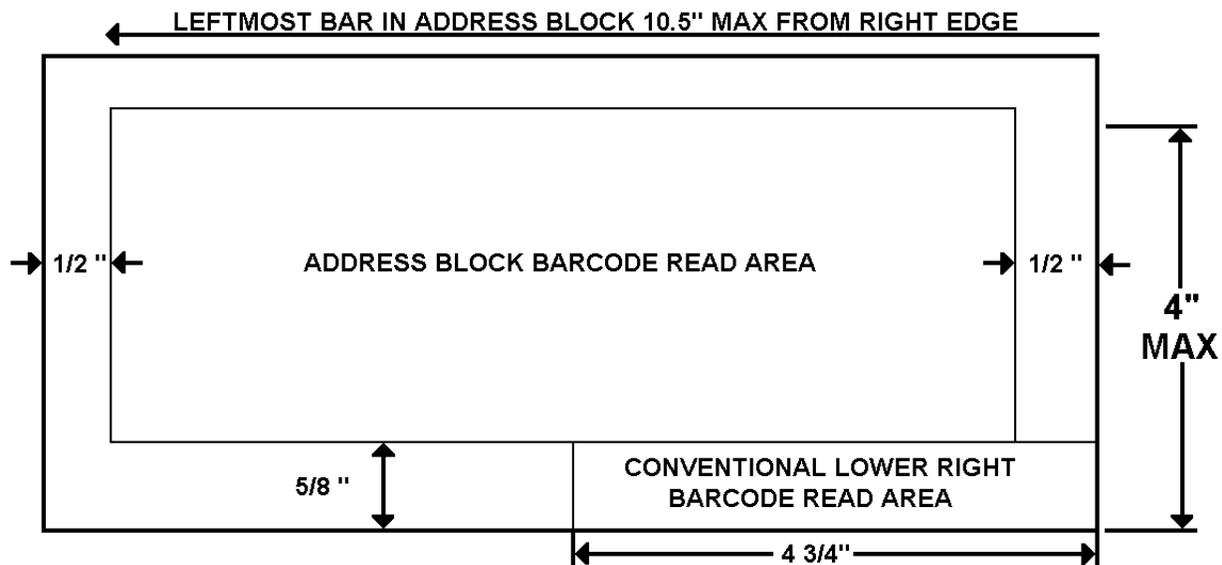
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**OCA/USPS-6.** The following questions refer to the location of a PLANET Code barcode in relation to a POSTNET barcode.

- a. How much latitude does the mailer have in placing the PLANET Code with the POSTNET barcode in order for the USPS mail processing equipment to read, collect and process a PLANET Coded mail piece?
- b. The Postal Service refers to PLANET Codes and POSTNET barcodes as a requirement of capturing PLANET Code data that is then provided to the mailer as a "flat file." In order to capture data, must the Postal Service have a POSTNET barcode placed on the mail piece at the time the mail piece is entered into the USPS mailstream? If so, please explain the data provided by the POSTNET barcode. If not, please explain why the Postal Service requires the POSTNET barcode as a precondition to using a PLANET Code.

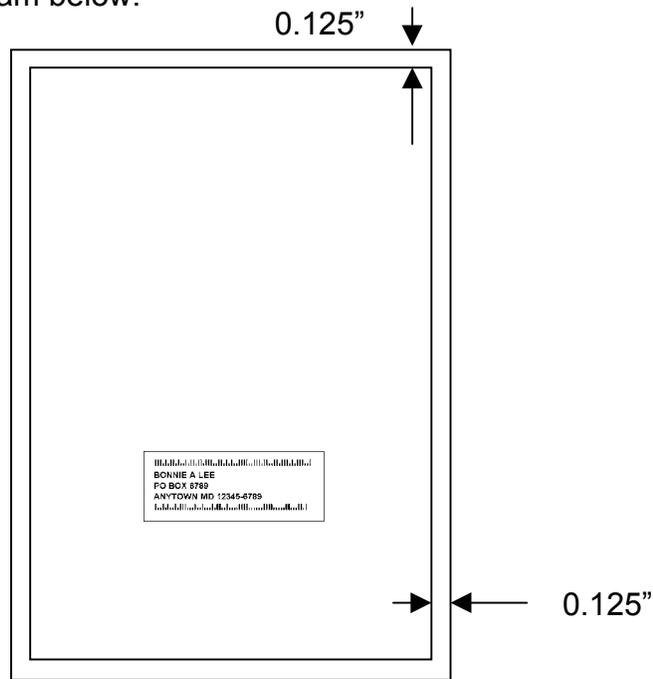
**RESPONSE:**

- a. PLANET Code specifications (available in the Confirm Customer Service Guide at the Confirm website [www.planetcodes.com](http://www.planetcodes.com)) for letters allow the PLANET barcode to be placed anywhere in the address block portion of the front of a letter except the lower right corner. See the diagram below.



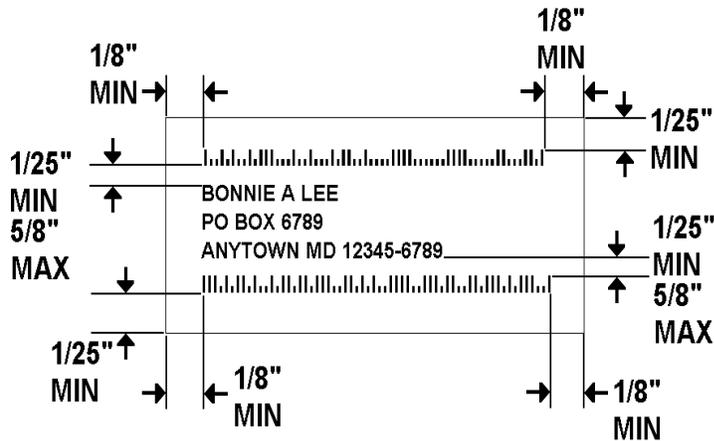
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For flats, the PLANET barcode must be positioned no closer than 0.125" from the edge, and, along with the address, must be parallel to an edge within +/- 15 degrees. To maximize readability on flats, it is further recommended that the POSTNET Code be placed below the address block (or, if applicable, above the Optional Endorsement Line). When printing labels, adherence to the clear zones identified in the specifications is required. See the diagram below.



The dimensional requirements for applying the PLANET and POSTNET barcodes are identified below.

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b. Yes, for presorted mail, which requires a POSTNET Code. For non-presorted mail, the POSTNET Code is not required in order for the system to capture data. For Destination Confirm, the system will capture data from a piece without the POSTNET Code but no POSTNET digits will appear in the data record. If the Postal Service sprays a POSTNET Code on the piece to facilitate sortation, then that POSTNET data should ultimately appear in the data record received by the mailer. For Origin Confirm, the system will not forward data if the piece does not contain the POSTNET Code because the POSTNET Code identifies the Confirm subscriber. If the Postal Service sprays the POSTNET Code on these Origin Confirm pieces, the subscriber will only receive data if the Postal Service-applied POSTNET Code matches the subscriber's POSTNET Code as programmed into the Confirm system.

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**OCA/USPS-7.** The following interrogatory is examining the requirement of whether or not the mailer must apply both a PLANET Code and POSTNET barcode to a mail piece prior to the letter and/or flat being entered into the USPS mailstream.

- a. If a mailer applied a PLANET Code to an automation compatible letter or flat, could the Postal Service subsequently apply its own POSTNET barcode to a mail piece and subsequently collect the same information as though the mailer had applied both the POSTNET barcode and the PLANET Code barcode?
- b. If your response to part “a” of this interrogatory is other than affirmative, please explain why not.
- c. If your response to part “a” of this interrogatory is affirmative, please provide the cost of having the Postal Service apply a POSTNET barcode to (1) a letter and (2) a flat.
- d. Is the Postal Service automated equipment currently capable of applying both a POSTNET barcode and a PLANET Code to (1) a letter and (2) a flat. If not, please explain why the equipment is incapable of applying both.
- e. If the Postal Service’s automation equipment is capable of applying both a POSTNET barcode and a PLANET Code to a mail piece, please provide the cost of applying both codes to (1) a letter and (2) a flat.

**RESPONSE:**

- a. Yes for letters, no for flats.
- b. Currently, the Postal Service does not have the capability to spray POSTNET Codes on flats.
- c. In the normal course of processing, non-pre-barcode, automation-compatible letters may have a POSTNET barcode applied to them by the Postal Service. This would ordinarily occur in an OCR-equipped sortation operation, so some depth of sort is achieved at the same time the barcode is applied. The per-piece cost of, for example, an Outgoing MLOCR-ISS operation (which includes other tasks besides applying a POSTNET barcode) is 0.843 cents. See Docket No. R2001-1, LR-J-60, page 17.

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d. The Postal Service can only apply POSTNET codes. Applying other codes would involve significant technological changes, further restrictions on clear zones, etc. Moreover, it is unclear what information would be embedded in a USPS-applied PLANET code.

e. N/A.

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**OCA/USPS-8.** Please provide a small sample file of USPS Confirm® Origin data records and a small sample file of USPS Destination Confirm® data records similar to that provided to PLANET Code users and referred to in your testimony as “comma-delimited flat file[s].” When providing the sample data files of Confirm® records, please provide files containing at least 10 records and no more than 50 records. Include in your response a complete description of each comma-delimited field.

**RESPONSE:**

See below. Similar information is provided in the Confirm Customer Service Guide available at the Confirm website [www.planetcodes.com](http://www.planetcodes.com).

This a sample of Destination Confirm data that is available to participating customers:

```
57104,919,10/01/2001 16:10:34,57401317223,42123450001
57104,919,10/01/2001 16:10:37,57401246401,42123450001
57104,919,10/01/2001 16:10:38,57446009797,42123450001
57104,919,10/01/2001 16:10:42,57454001313,42123450001
57104,919,10/01/2001 16:10:45,57462301027,42123450001
57104,919,10/01/2001 16:10:47,57469116909,42123450001
57104,919,10/01/2001 16:10:49,57479630805,42123450001
57104,919,10/01/2001 16:10:53,57462305026,42123450001
57104,919,10/01/2001 16:10:55,57469113476,42123450001
57104,919,10/01/2001 16:10:58,57479633985,42123450001
```

This a sample of Origin Confirm data that is available to participating customers:

```
75099,891,02/09/2001 17:21:34,85072225252,50040362003
75099,891,02/09/2001 11:45:23,85072225252,50040572389
75099,891,02/09/2001 17:44:02,85072225252,50040578772
75099,891,02/09/2001 14:52:43,85072225252,50040620805
75099,891,02/09/2001 14:54:19,85072225252,50040746128
75099,891,02/09/2001 17:37:54,85072225252,50040781227
75099,891,02/09/2001 17:30:33,85072225252,50040828788
75099,891,02/09/2001 14:54:19,85072225252,50040746126
75099,891,02/09/2001 17:37:54,85072225252,50040781253
75099,891,02/09/2001 17:30:33,85072225252,50040828382
```

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Key:

First 5 columns: Facility ID (ZIP)  
Next 3 columns: Operation number (list available from USPS)  
Next 10 columns: Date mail piece was processed (mm/dd/yyyy)  
Next 5 columns: Time mail piece was processed (hh:mm:ss)  
Next 11 columns: POSTNET Code  
Next 11 columns: PLANET Code

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**OCA/USPS-9.** Can the PLANET Code mailer currently view his/her individual Confirm® data records from the Postal Service Confirm® website?

- a. If so, please provide a copy of the screen displays available to the user when viewing data records from the Postal Service's Confirm® website.
- b. If the data records cannot be currently viewed by PLANET Code mailers, please explain and provide copies of the screens that are available to the mailer when the Postal Service's Confirm® website is accessed by a participating mailer.

**RESPONSE:**

Yes. Confirm subscribers can view mail piece scan data in the Mail Piece Summary Report section on the Confirm website. Subscribers can also download raw data records via the website.

- a. The screen displays for the Mail Piece Summary Report are provided in the Confirm Operational Reports Manual filed as USPS-LR-3/MC2002-1.
- b. N/A.

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**OCA/USPS-10.** With regard to information collected from PLANET Codes, what data is the Postal Service currently collecting for its own use? Please identify (1) the types of information that are collected, (2) the extent to which the information is being collected and (3) which facilities are collecting the information. For example: all mail processing facilities are collecting “x, y and z” data on every Confirm® mail piece.

- a. Please provide a sample copy of each data report generated by the Postal Service for use in analyzing PLANET Coded mail.
- b. If your response to this interrogatory is that the Postal Service is not collecting and analyzing the data, please explain why not.

**RESPONSE:**

With the exception of the sites and equipment listed in the response to OCA/USPS-T1-1(c), all other facilities and mail processing equipment collect the same information on every piece of Confirm mail processed. The data collected are those referred to in the response to OCA/USPS-T1-9. In addition to those items, we also collect Machine ID and ID Sort Tag Code, which are made available internally.

- a. See USPS-LR-3/MC2002-1.
- b. N/A.

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**OCA/USPS-11.** At page 3 of your testimony, you indicate that “[t]he first two digits of the PLANET Code represent service type – Destination or Origin Confirm.®.” Please provide a list of all the 2-digit PLANET Codes and include in your response a description of the logic used to assign the first 2-digit PLANET Codes to a particular service type. For example, the first digit identifies Origin or Destination and the second digit identifies the service type.

**RESPONSE:**

Origin Confirm Codes are two-digits starting with 5. The second digit is assigned based on mail type. The service code 21 is a generic Origin code that was originally used during the Pilot Program.

- 50 – Courtesy Reply Letters
- 51 – Courtesy Reply Flats
- 52 – Business Reply Letters
- 53 – Business Reply Flats
- 54 – Business Reply Cards
- 56 – QBRM Letters
- 57 – QBRM Cards
- 58 – Courtesy Reply Cards
- 21 – Residual Mail

Destination Confirm Codes are two-digits starting with 4. The second digit is assigned based on mail type. The service code 22 is a generic Origin code.

- 40 – First Class Letters
- 41 – First Class Flats
- 42 – Standard Letters
- 43 – Standard Flats
- 44 – Periodical Letters
- 45 – Periodical Flats
- 46 – First Class Cards
- 47 – Standard Cards
- 22 – Residual Mail

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**OCA/USPS-12.** At page 3 of your testimony, you indicate that an Origin Confirm® mailer can use all nine of the remaining digits to identify the mail piece as they choose. For an Origin Confirm® mail piece, how does the Postal Service know which mailer is to receive the USPS scanned “flat data file?”

**RESPONSE:**

The Postal Service identifies the subscriber by the POSTNET Code that the subscriber has applied to the reply piece. This information is programmed when the subscriber is approved for the Confirm service.

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**OCA/USPS-13.** Please refer to your testimony at page 3 where you state, "Within the Planet Code, mailers embed a postal assigned ID Code and their own information so that their mail pieces can be tracked." Subsequently, on lines 22-3 of that same page of testimony you note that five digits are set aside for the Destination Confirm® mail piece ID Code.

- a. Why has the Postal Service limited the maximum number of customer ID codes to a theoretical maximum of 100,000 (including 00000).
- b. If the maximum number of ID codes is not limited to 100,000, please explain what the maximum number is and how the Postal Service has been able to overcome an apparent 100,000 limit.
- c. Please explain how the limited number of ID Codes may affect the total number of potential Confirm® mailers.
- d. Is it feasible for the postal automation equipment used in scanning POSTNET and PLANET Code barcodes to recognize alpha-numeric values? If not, please explain why not.

**RESPONSE:**

- a. The Postal Service has not theoretically limited the number of IDs to 100,000.
- b. The capability exists to activate additional service IDs. This will enable the Postal Service to identify additional subscribers, as needed.
- c. N/A.
- d. No. Types of equipment which read PLANET /POSTNET barcodes do not recognize alphanumeric characters. They are designed to read barcodes.

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**OCA/USPS-14.** Please refer to your testimony at page 2, lines 17 through 19, where you indicate, “Confirm® is designed to meet the needs of many types of mailers, but particularly those of large-volume national mailers that have a need to improve their mail-related business processes or refine their customer data.”

- a. Please explain why Confirm® is not also particularly useful to smaller local commercial mailers mailing a few thousand letters or reply letters to improve mail-related business processes or refine customer data.
- b. Please provide any Postal Service documents discussing or stating the reasons Confirm® was targeted to large national customers and/or why it was not targeted to smaller commercial customers.

**RESPONSE:**

a. My testimony does not support the assertion that Confirm is not also particularly useful to smaller local mailers in meeting the needs cited. It is likely that several Confirm subscribers will be resellers who will offer the benefits provided by the Confirm service to smaller local mailers. Moreover, one needs to distinguish use of PLANET barcodes from Confirm service, as proposed. Use of the former is likely to expand, potentially providing additional benefits to smaller mailers. The proposed Confirm service is, at least now, likely to be more attractive to larger mailers.

b. No such documents exist because the Postal Service never intended to limit use of PLANET barcodes to large national customers. After initially exploring the concept of a service like Confirm with focus groups, however, the Postal Service determined that larger mailers would likely be more interested in Confirm than smaller mailers. For this reason, the Postal Service focused that portion of the market research designed for projecting the demand for Confirm on larger mailers. The Postal Service expects the demand for Confirm identified by this market research to form the greatest part, though not the totality, of the demand for Confirm. The Postal Service views focusing the

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market research on larger mailers as a suitably conservative way to project demand, while not excluding smaller mailers from participating in Confirm. The Postal Service expects that smaller commercial customers will be served through Confirm resellers. In addition, as pointed out in the testimony of witness Kiefer (USPS-T-5), the Postal Service is proposing to offer Confirm service in a Silver subscription with a subscription fee set at a level that encourages, rather than discourages, customers who only have a limited need for Confirm.

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**OCA/USPS-15.** On page 5 of your testimony, you state the “mail acceptance personnel will scan the barcode using the Delivery Confirmation hand-held scanners when they accept the mail.” This will start the clock on the measuring process. Are the hand-held scanners used by the Postal Service mail acceptance personnel the same type of scanners that carriers use to scan a Delivery Confirmation mailpiece?

**RESPONSE:**

Yes.

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**OCA/USPS-16.** Please provide a hardcopy application form given to customers wishing to participate in the Confirm® program.

**RESPONSE:**

See attachment. Also, the application may be accessed electronically by going to

[www.planetcodes.com](http://www.planetcodes.com), then clicking on Resources.

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**OCA/USPS-17.** Please explain how customers wishing to apply for the Confirm® service locate the on-line application form.

**RESPONSE:**

The homepage for the Confirm website, [www.planetcodes.com](http://www.planetcodes.com), contains a menu item at the top of the page that says Confirm Application.

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**OCA/USPS-18.** Are delivery confirmation hand held scanners capable of reading a PLANET Code barcode and a POSTNET barcode? If not, can the scanners be reprogrammed to read a PLANET Code barcode and a POSTNET barcode? Please explain.

**RESPONSE:**

No. In order to read a PLANET Code barcode and a POSTNET barcode, the scanners would need to be retrofitted with a different scan engine along with software reprogramming.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

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