

ORIGINAL

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS NEEDHAM TO INTERROGATORIES OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
REDIRECTED FROM WITNESS LYONS  
(OCA/USPS-T1-23-24)

The United States Postal Service hereby provides responses of witness Needham to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T1-23-24, filed on July 30, 1996, and redirected from witness Lyons.

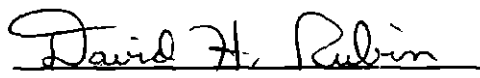
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

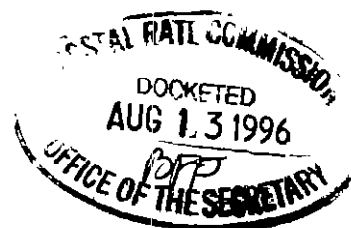
By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



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August 13, 1996



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(REDIRECTED FROM WITNESS LYONS)

OCA/USPS-T1-23. USPS witness Needham's testimony, USPS-T-7 at 23-24, states,

[N]on-residents would be defined as those individual or business boxholders whose residence or place of business is not located within the 5-digit ZIP Code area of the office where box service is obtained. In those circumstances where a local street address is not confirmed by a postal employee in the office where the box is located, individual boxholders would be asked to provide proof of residency . . .

Several proof of residency alternatives are listed in her testimony. Not all of the alternatives identified include a photo.

- a) Will a postal employee verify that the applicant actually resides at the street address listed on the boxholder application?
- b) Please explain how the Postal Service will confirm that the boxholder applicant actually lives at the street address provided.
- c) If photo identification is not required by the Postal Service, please explain how postal employees will verify the identity of the applicant.

RESPONSE:

a and b) As stated in my testimony, USPS-T-7, page 24, lines 2-11, if a local street address cannot be confirmed by a knowledgeable postal employee (generally the letter carrier), the applicant would be required to provide proof. Either a postal employee's confirmation through personal knowledge or proof of a local street address would satisfy verification.

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- c) Currently a photo identification is not required by the Postal Service to verify the identity of boxholder applicants. See DMM 910.2.3. Implicit in the interrogatory is the premise, with which the Postal Service agrees, that photo identification is preferable. The Postal Service does not, however, want to preclude reliance on other reliable information. It is my understanding that the details of how applicants' identities and street addresses are to be verified would be determined as part of the implementation process.

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OCA/USPS-T1-24. Assume that a state, such as Arizona, issues a driver's license that may have either a post office box address on the license or a physical mailing address.

- a) What form of identification will the Postal Service require of postal patrons to verify that the post office box applicant is a local resident?
- b) Will the Postal Service implement different identification requirements based upon the locality?

RESPONSE:

- a) In many cases, a postal employee will be able to verify a local address by personal knowledge. In these cases, no form of identification would be required. In all other instances, applicants claiming eligibility for resident fees would be required to provide verifiable proof of a street address in order to qualify for the applicable resident fees. Please see my testimony, USPS-T-7, page 24, lines 2-11, where I provide examples of proof of a street address. Such proof would need to include the physical street address.
- b) No. In cases when a postal employee cannot verify a local address by personal knowledge, customers would have to present documentation sufficient to demonstrate where they reside or conduct business. As part of the implementation process, guidelines concerning how to handle variations of identification forms around the nation may be developed.

**DECLARATION**

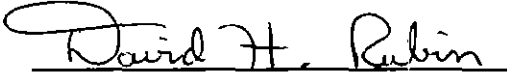
I, Susan W. Needham, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Susan W. Needham

Dated: August 13, 1996

**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.

  
David H. Rubin

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