

ORIGINAL

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

SPECIAL SERVICES REFORM, 1996

Docket No. MC 96-3

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS NEEDHAM TO INTERROGATORIES OF
DAVID B. POPKIN
(DBP/USPS-T8-14-34)

The United States Postal Service hereby provides responses of witness Needham to the following interrogatories of David B. Popkin: DBP/USPS-T8-14-34, filed on September 5, 1996.

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

Respectfully submitted,

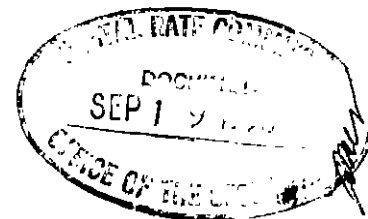
UNITED STATES POSTAL SERVICE

By its attorneys:

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September 19, 1996



RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
NEEDHAM TO INTERROGATORIES OF DAVID B. POPKIN

DBP/USPS-T8-14 I have a number of questions regarding your response to DBP/USPS/T1-1 [a] Would your response to [d] have been yes if I had stated "turn it over to the clearing clerk [who must mail it back no later than the first workday after delivery]" instead of "mail it back to the sender." [b] If not, why not? [c] Confirm that the only directives, memoranda, or regulations which exist are those that are contained in Domestic Mail Manual Transition Book [DMMTB] 932.41. [d] If not, provide me with copies of any other documents. [e] Your response to T1-1[g] refers me to the ability to utilize signature stamps. This was covered in my question T1-1[d] by the words "or authorized signature stamp". Please respond to the specific question asked in T1-1[g], namely, Are there any exceptions to the policy contained in DMMTB 932 and noted in T1-1[d] as corrected in [a] above? [f] If so, provide a listing and the authority for each exception. [g] Do the requirements of DMMTB and as noted in T1-1[d] as corrected in [a] above apply to all mail which is sent to federal government agencies in the Washington DC area? [h] If not, explain and provide the authority for the exception including copies of any directive or memorandum that authorizes it. [i] Do the requirements of DMMTB and as noted in T1-1[d] as corrected in [a] above apply to all mail which is sent to any addressee [including but not limited to federal agencies outside the Washington DC area, state government agencies, local government agencies, the Postal Service, organizations that have a unique ZIP Code, large organizations, organizations that receive a large number of pieces of accountable mail]? [j] If not, explain and provide the authority for the exception including copies of any directive or memorandum that authorizes it. [k] Is there a written or unwritten policy or practice which permits or allows accountable mail to be delivered to any addressee [see [g] and [i] above for some examples] with the Form 3811 attached and leaves it up to the agency or addressee to complete the return receipt by themselves and deposit it in the mail or return it at a later time? [l] If so, provide details and copies of the regulation, directive, memoranda, etc. which authorizes this procedure. [m] Your response to T1-1[j] makes reference to USPS LR-SSR-137. As requested in my instructions, please provide me with a copy of the library reference. [n] Your response to T1-1[j] appears to indicate that the only agency agreements that exist with respect to the delivery of accountable mail are with respect to the delivery of mail on military installations. Please confirm. [o] If your response to [n] is not confirmed, please provide any other agency agreements that exist - details and copies. [p] Does any agency agreement for the delivery of accountable mail provide for the reimbursement or payment of costs to the other party? [q] If yes, provide details and amounts. [r] If no, you or some other USPS employee please respond to T1-1[k].

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RESPONSE:

- a) Confirmed.
- b) N/A.
- c) Not Confirmed.
- d) See attachments.
- e) I am unaware of authorized exceptions to DMMTB 932 and the attachment to DBP/USPS-T8-3.
- f) Not applicable
- g) That is my understanding from DMMTB 932 and the attachment to DBP/USPS-T8-3.
- h) Not applicable
- i) See my response to (g).
- j) Not applicable
- k) I am not aware of a written or unwritten policy that permits or allows accountable mail delivered to any addressee with the form 3811 attached and leaves it up to the agency or addressee to complete the return receipt and deposit it in the mail or return it at a later time.
- l) Not applicable.
- m) See response to DBP/USPS-T8-16(d).
- n) Confirmed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
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o) Not applicable.

p-r)No.

336 Return Receipt

- 336.1 Obtain on Form 3811 the signature of person receiving the registered, certified, or numbered insured mail when the form is attached and/or the article is endorsed, *Return Receipt Requested*. Enter date of delivery in the space provided. See that the address side of Form 3811 is completed. If delivered to other than the addressee or authorized agent, the addressee's name and address shall be entered on line 2 and signature of the person receiving the article and date of delivery on line 4 (see exhibit 336.1).

Exhibit 336.1

SENDER: Complete items 1 and 2, and return to office on return address in the box provided.	
1. The following service is requested (check one):	
<input type="checkbox"/> Show to whom and date delivered..... 15¢	<input checked="" type="checkbox"/> DELIVER ONLY TO ADDRESSEE and show to whom and date delivered..... 65¢
<input type="checkbox"/> DELIVER ONLY TO ADDRESSEE and show to whom, date, and address of delivery..... 85¢	2. ARTICLE ADDRESSED TO: SISCO INSURANCE CO 502 MAIN ST. DALLAS TEXAS 75202
3. ARTICLE DESCRIPTION: REGISTERED NO. 14752	CERTIFIED NO. INSURED NO.
I have received the signature of addressee or agent (Always obtain signature of addressee or agent)	
SIGNATURE: James Murphy, Jr. Sisco Insurance Co.	
DATE OF DELIVERY: 1-23-74	POSTMARK
4. ADDRESS (Complete only if requested): 502 Main Street	
5. UNABLE TO DELIVER BECAUSE:	
CLERK'S INITIALS	

PS Form 3811, Nov 1973 RETURNED RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

- 336.2 If the article is endorsed, *Return Receipt Requested — Showing Address Where Delivered*, enter the address where the article was delivered in space provided.
- 336.3 If the article is endorsed to indicate delivery is restricted, it should be treated in accordance with section 335.12.

337 Government Checks and Bonds

- 337.1 Government checks and bonds include those issued by states, counties, and cities; and those issued for welfare assistance.
- 337.2 Make sure checks are placed in the correct receptacles and, if practicable, behind other mail matter.
- 337.3 Do not leave checks outside of receptacles at any time.
- 337.4 Do not attempt *Trial Deliveries* under any circumstances.
- 337.5 Dispose of undeliverable checks according to instructions.
- 337.6 If mail cannot be left in a reasonably safe place, return checks or bonds to delivery unit leaving Form 3570 in the mailbox. This mail is held at your unit awaiting pickup by the customer, or notification by the customer as to the date he wishes to meet you to effect delivery.

432 Registered and Certified

- 432.1 Give finance clerk all undeliverable articles and Forms 3849 and/or 3811 for each registered and certified delivery.
- 432.2 Complete Form 3821 showing the number of receipts and undeliverable articles returned to the clerk. Ensure that any accountable items found in the DPS mail are added to the total accountable pieces included on the form. If form is properly completed, clerk will sign and return it to you. This is your receipt, keep it for a 2-year period (see exhibit 432.2).

PB 21864
03-31-94

Exhibit 432.2

POST OFFICE OR STATION <u>Ft. George</u>				DATE <u>2-22-74</u>	
RECEIVED OF <u>C. Danell</u>				Route No. <u>155</u>	
the registered articles listed or total certified articles shown below; also signed receipts for such mail delivered.					
REGISTERED				CERTIFIED	
ARTICLE NOS		Returned Articles		Returned Articles	
<u>178</u>			<u>1</u>		<u>1</u>
<u>342</u>		No. of Receipts	<u>1</u>	No. of Receipts	<u>2</u>
		TOTAL	<u>2</u>	TOTAL	<u>3</u>
SIGNATURE OF CLEARING EMPLOYEE <u>Jane Moore</u>					
PS Form 3868 CARRIER'S CLEARANCE RECEIPT • GPO 1971 OF—613-909 Dec. 1970 U. S. POSTAL SERVICE					

- 432.3 Enter the date of delivery and your signature in the spaces provided on Form 3849 — if you didn't do this when you delivered the article (see section 335.1). Deposit Form 3849 in the designated receptacle or give it to the finance clerk for clearance.

433 Insured Mail

Put all Forms 3811 which were requested by senders of insured mail in designated places. Complete Form 3849 as specified for registered and certified mail.

434 COD's

- 434.1 Surrender to clearance clerk COD tags and the money for all delivered COD parcels. Return all undelivered COD's for clearance.
- 434.2 *If Form 3821 is used at your office, verify the entries after clerk has entered the amount of funds and the number of parcels accounted for (see exhibit 434.2). Carrier must place original of Form 3821 in locked receptacle provided and keep the duplicate for 3 months from last day of month issued. (Clerk may not do this.)*
- 434.3 *If Form 3821 is not used at your office, clerk will initial and return delivery employee coupon to you. Keep this coupon for 2 years.*

Form 3584, *Postage Due Log*. You may make a reasonable effort at a future date to collect the amount due from the customer.

341.3 CODs

341.31 Acceptance.

341.311 Customers may present COD articles to rural carriers for mailing with either postage and fees affixed or by paying cash for the required postage and fees. If customers desire additional insurance coverage greater than the COD amount to be collected, they must indicate how much additional insurance they want.

341.312 Issue Form 1096, *Cash Receipt*, endorsed *temporary* to show the amount of money received for postage and fees and the name of the post office of destination. Take the articles to the post office, affix stamps to cover the postage and fees, and deliver the mailer's receipt portion of Form 3816, *COD Mailing and Delivery Receipt*, on the next delivery day (see Exhibit 341.312a).

341.313 Customers at nonpersonnel units must meet the rural carrier at the unit for COD services (see DMM, 914.422).

341.32 Delivery

341.321 If addressees indicate that they will pay for the COD parcel, detach the COD tag (Form 3816) and have the customers sign it in the space provided.

341.322 Deliver the parcel after you have received all funds and the customer has signed Form 3816. If there is a difference between the amount of the charges shown on the tag and the amount of the package, collect the higher amount. If the money order fee is not correctly stated on the tag, correct the fee and report the error to your postmaster or supervisor.

341.323 Complete the Form 3816 showing the date of delivery and your initials, and return it with funds to the post office (see Exhibit 341.312b).

341.324 Complete and leave a Form 3849 when you cannot make a delivery. Endorse the article with the reason for nondelivery, write the date and your initials on the article, and return it with the tag intact to the post office.

341.4 Registered Mail

341.41 Acceptance

341.411 Customers may register an article by paying the required postage and fees.

341.412 Issue the customer a receipt on Form 3896, *Receipt for Registered Article*. Prepare the receipt in duplicate and give the carbon copy to the customer. Return the original Form 3896, the stub from the carbon copy, and the article to be registered to the post office (see Exhibit 341.412).

341.413 Keep registered mail accepted on the route separate from ordinary mail collected.

341.42 Delivery

341.421 Deliver registered articles to anyone authorized to receive mail for the addressee. This person must sign Form 3849 before you may deliver the article. Require identification if the customer is unknown.

341.422 Articles that are not endorsed *Restricted Delivery* may be delivered to a competent member of the family, an agent, or to the person designated on the Form 3801-A, *Agreement by a Hotel, Apartment House, or the Like*, used to authorize delivery to a central point (i.e., a hotel, motel, trailer park, etc.) or Form 3801, *Standing Delivery Order*.

341.423 Deliver articles endorsed *Restricted Delivery* to addressee, or to an agent the addressee authorizes, in writing, to receive the restricted delivery mail. Form 3849, or a letter from the addressee, can be used for this authorization.

341.424 When a person other than the addressee signs for an article, the person must enter his or her own name on line headed *Received By*.

341.425 Complete Form 3849 to show the date of delivery and your signature (see Exhibit 253.21).

341.426 Form 3883 may be authorized for use on L routes, where warranted. (See 252.21d for delivery instructions.)

341.43 Incomplete Delivery. Complete and leave Form 3849 when delivery cannot be made. Endorse the article with the date and your initials. Return the article to the post office.

341.44 Form 3811.

341.441 Have the person receiving the article sign Form 3811, *Domestic Return Receipt*, when this form is attached, or when the article is endorsed *Return Receipt Requested*. In the space provided, enter the date of delivery and ensure that the address side of the form is complete. If the article is delivered to a person other than the addressee, verify that the addressee's name and address were entered, and the signature and date of delivery blocks are complete (see Exhibit 341.441).

341.442 If the article is endorsed *Return Receipt Requested--Showing Address Where Delivered*, enter the address where the article was delivered.

341.5 Certified Mail

341.51 Acceptance

341.511 After they have paid all postage and fees, issue customers presenting mail for certification a receipt on Form 3800, *Receipt for Certified Mail* (see Exhibit 341.511).

341.512 If a customer requests a postmarked receipt, deliver it on the next trip.

341.52 Delivery

341.521 Deliver certified articles to anyone authorized to receive mail for the addressee. This person must sign Form 3849 before you may deliver the article. Require identification if the customer is unknown.

341.522 Articles not endorsed *Restricted Delivery* may be delivered to a competent member of the family, an agent, or to the person designated on the Form 3801-A used to authorize delivery to a central point (i.e., a hotel, motel, trailer park, etc.) or Form 3801.

341.523 Deliver articles endorsed *Restricted Delivery* to addressee or to an agent the addressee authorizes, in writing, to receive the restricted delivery mail. Form 3849 or a letter from the addressee may be used for this authorization.

341.524 When persons other than the addressee sign for an article, they must enter their own name on the line headed *Received By*.

341.525 Complete Form 3849 showing the date of delivery and your signature (see Exhibit 253.21).

341.526 Form 3883, *Firm Delivery Book--Registered, Certified and Numbered Insured Mail*, may be authorized for use on L routes where warranted. (See 252.21d for delivery instructions.)

341.53 Incomplete Delivery. Complete and leave Form 3849 when delivery cannot be made. Endorse the article with the date and your initials. Return the article to the post office.

341.54 Form 3811.

341.541 Have the person receiving the article sign Form 3811 when this form is attached or when the article is endorsed *Return Receipt Requested*. Enter the date of delivery in the space provided and ensure that the address side of the form is complete. If the article is delivered to a person other than the addressee, verify that the addressee's name and address were entered, and

the signature and date of delivery blocks are complete (see Exhibit 341.441).

341.542 If the article is endorsed *Return Receipt Requested--Showing Address Where Delivered*, enter the address where the article was delivered.

341.6 Insured Mail

341.61 Acceptance

341.611 Customers may obtain insurance for an article by paying the required postage and fees.

341.612 Issue Form 1096 endorsed *temporary* to show the amount of money received for postage and fees and the name of the post office of destination. Take the mail to the post office, affix stamps to cover the postage and fees, and deliver a completed insurance receipt on the next trip. Using Form 4245 (see Exhibit 341.612), return to the customer any excess money collected.

341.62 Delivery. Unnumbered insured parcels are delivered as ordinary parcels (see part 330).

341.621 Deliver numbered insured articles to anyone authorized to receive mail for the addressee. This person must sign Form 3849 before you may deliver the article. Require identification if the customer is unknown.

341.7 Special Delivery

341.71 Acceptance. Customers may send articles as special delivery by paying the required postage and fees.

341.72 Delivery

341.721 Deliver as outlined in 341.121.

341.722 When delivery is attempted at a residence or place of business but cannot be made, leave the special delivery article in the mailbox and leave a notice of attempted delivery on Form 3849 at the residence or place of business.

341.73 Return of Article If the article is too large for the box or is accountable, complete and leave Form 3849 when delivery cannot be made. Endorse the article with the date and your initials. Return the article to the post office.

341.8 Customs Duty Mail

341.81 Acceptance. Collect duty (amount shown on Customs Form 3419, *Mail Entry*) plus the postage due indicated on the parcel.

341.82 Delivery. Have the addressee sign on the bottom line of the original Customs Form 3419. Sign the duplicate Customs Form 3419, and de-

422.6 Express Mail

422.61 Handling. Give your postmaster or supervisor, or designee, all articles accepted and the accompanying forms.

422.7 COD

422.71 Handling. After affixing stamps to cover postage and fees, give the article and tag to the postmaster or supervisor, or designee, for handling. The clearing employee provides you with the mailer's receipt portion of Form 3816, *COD Mailing and Delivery Receipt*. Deliver the mailer's receipt on the next delivery day.

430 Clearance and Disposition of Accountable Items

431 Registered, Certified, and Express Mail

431.1 Handling

Give the postmaster or supervisor, or designee, all of the following for all articles attempted for delivery:

- a. Undeliverable registers.
- b. Certified and Express Mail articles.
- c. Forms 3849, *Delivery Notice/Reminder/Receipt*.
- d. Forms 3811, *Domestic Return Receipt*.
- e. Labels 11-B, *Express Mail Next Day Service Post Office to Addressee*.

431.2 Clearance

The postmaster or supervisor, or designee, clears each item on Form 3867, *Registered Express Mail, COD, Certified, and Return Receipt for Merchandise Mailed Received for Delivery* (see Exhibit 431.2).

431.3 Form 3883

Where the use of Form 3883, *Firm Delivery Book--Registered, Certified and Numbered Insured Mail*, has been authorized, return the original bill (as proof of delivery) and all return receipts for articles listed for clearance.

431.4 Form 3821

Complete Form 3821, *Clearance Receipt*, showing the number of receipts and undeliverable articles returned for clearance. If the form is properly completed, the clearing employee signs and returns it to you. This relieves you of further responsibility for the items (see Exhibit 431.4).

432 CODs

432.1 Handling

Return to the postmaster or supervisor, or designee, all tags and funds for delivered and undelivered COD articles.

432.2 Clearance

The postmaster or supervisor, or designee, clears each item on Form 3867 (see Exhibit 252.21c).

432.3 Form 3821 for Delivered Articles

Complete a separate Form 3821 for each COD article delivered. If you completed the form correctly, the clearing employee signs and returns it to you. This relieves you of further responsibility (see Exhibit 431.4).

432.4 Form 3821 for Articles Not Delivered

Complete one Form 3821 for all CODs not delivered. If you completed the form correctly, the clearing employee signs and returns it to you. This relieves you of further responsibility. **Note:** If a Form 3821 was completed for clearance of registered, certified, or Express Mail, include on that form CODs not delivered. Do not complete another Form 3821.

432.5 Retention of Receipts

Keep all clearance receipts in your locker, or in another secure location, for possible future reference. (The required retention period for this form is 2 years. Filing such items at the case does not provide adequate security and clutters the work area.)

433 Postage Due

433.1 Collected Funds

Return to the postmaster or supervisor, or designee, all funds collected on postage due mail and for any undelivered articles.

433.2 Form 3584

The clearing employee enters the number of articles returned in the *Pieces* column and the amount of postage due remitted in the *Amount* column of Form 3584, *Postage Due Log*.

434 Customs Duty Mail

434.1 Handling

Return to the postmaster or supervisor, or designee, any undelivered articles, Customs Form 3419, *Mail Entry*, and all funds collected for custom duty mail.

c. Make other arrangements for receiving mail until normal service can be restored; or

d. Accept reduced delivery frequency until condition is corrected.

334 Box Problems

Contractors should report any problems affecting delivery or collection to the administrative official, who will investigate any deficiencies and issue written notices to the customers. *It is the administrative official's responsibility to resolve these problems with the customers.* The contractor will issue Form 4056, *Your Mailbox Needs Attention*, where appropriate.

335 Sign

The use of a "U.S. Mail" sign on the vehicle is permissible, but only when the vehicle is actually carrying mail. *Any other use of the USPS emblem facsimile is prohibited.*

340 Special Services and Accountable Mail

341 General

341.1 Responsibility. Responsibility for accountable (see 324.1) mail is assumed by the contractor upon receipt from the administrative official. All accountable mail (other than special delivery and Express Mail) will be delivered only to the customer box. Dismounting may be required to transact business involving registered, certified, insured, COD, special delivery, and Express Mail. Any accountable mail found mixed in with the regular mail should be given to the administrative official for disposition.

341.2 Customer Notification

341.21 Postmasters should telephone customers to inform them to meet the contractor at the box for special services and accountable mail, including special delivery and Express Mail.

341.22 Form 3849 is used to notify customers and/or obtain receipt for all accountable mail. In smaller offices where the mail check claim system is not used, Form 3849 is used for notice to customers on all appropriate types of mail. Contractors should follow the procedures established by the administrative official.

342 Registered Mail

Unless the customer has requested otherwise, registered mail will be delivered on the first trip following its receipt. The addressee or person representing the addressee may obtain the name and address of the sender and may look at the registered mail while it is held by the contractor before signing the delivery receipt. Identification will be required if the applicant for registered mail is unknown. If the register(s) cannot be delivered on the first trip, leave a Form 3849, *Delivery Notice/Reminder/Receipt*, in the customer's box. A second attempt to deliver should be made if the customer desires. Leave Form 3849 endorsed "Final Notice" if delivery cannot be made on the second attempt. In addition, if return receipt is desired by the mailer, contractors must obtain customer signature on Form 3811, *Domestic Return Receipt*.

343 Insured Mail

Unnumbered packages will be delivered as ordinary parcels. For numbered packages, contractors will use Form 3849 to obtain customer receipt. If return receipt is desired by the mailer, contractor must also obtain customer signature on Form 3811.

344 Special Delivery Mail

Contractors may take special delivery to the customer's home, if the home is not more than 1/2 mile from the route line of travel for a total round trip of one mile, and if such service does not cause a substantial delay. If delivery is attempted and cannot be made to the customer residence, Form 3849 is left at the residence and the special delivery article is placed in the customer box.

345 Certified Mail

Instructions for the delivery of certified mail are the same as those for registered mail. (See 342.)

346 Postage Due Mail

Postage due mail is delivered only after the full amount due has been paid. Use Form 3849 to notify customer when delivery cannot be made.

347 COD Mail

347.1 Examination by Customer. Addressee or addressee's representative may read and copy the name and address of the mailer of COD mail while in the possession of the contractor. *Examination of the contents may be made only after charges have been paid and delivery accomplished.*

347.2 Charges to Collect. Contractor will collect the charges entered on Form 3816. *C.O.D. Article--Delivery Employee Coupon/Mailing Office Coupon/Mailer's Receipt.* If there is a difference between the amount of charges shown on the tag and the amount on the package, collect the higher amount. Customer must have the exact amount of money needed to pay for COD charges and money order fee (see administrative official regarding acceptance of personal checks).

347.3 Delivery Procedure. Detach Form 3816 from the parcel and have the customer sign in the space provided. Contractors must enter date of delivery and initials, and return tag with the funds to the postmaster or designated representative, together with undelivered COD mail. Tags will be receipted by the clearing employee and returned to the contractor. *Tags must be retained by the contractors for 2 years.*

347.4 COD Not Delivered. When delivery cannot be made, contractors should endorse the article with the reasons, initial, and return with tag to the administrative official. Form 3849 should be completed and left at the customer box.

348 Customs Duty Mail

Contractors must collect from customer the amount shown on U.S. Customs Form 3419 plus the postage due indicated on the parcel. The customer signs on bottom line of original Form 3419; the contractor signs the duplicate Form 3419 and delivers it with the parcel to the addressee. The contractor then returns the original Customs Form 3419 and all money collected to the administrative official.

349 Express Mail

349.1 Delivery Procedure. Have the addressee or agent sign in the signature block on Label 11-B, *Express Mail Next Day Service Post Office to Addressee.* Do not use any other record or receipt. Enter the exact time, date of delivery, and your initials on the label. Snap out the *proof of delivery* copy. Give the article to the agent or addressee and return the form to the post office for clearance.

349.2 Express Mail Not Delivered. When delivery cannot be made, complete and leave Form 3849. The contractor will apply the same delivery for Express Mail that applies to special delivery. (See 344.)

350 Collection and Disposition**351 General**

Contractors will collect any properly stamped First-Class Mail from mailboxes placed along the line of the route when the box signal flag is up indicating that the box contains mail for collection. Other classes of mail will be collected provided the customer meets the contractor and provides the contractor with sufficient funds to cover the mailing. The article will be taken to the next post office for mailing and any excess money will be returned to the customer on the next trip.

352 Special Service and Accountable Mail

352.1 Registered Mail. Customers may register an article by paying the required postage and fees. Contractors prepare Form 3896, *Receipt for*

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DBP/USPS-T8-15 Your response to DBP/USPS-T1-2[a] appears to be in conflict with your response to DBP/USPS-T1-1. T1-2[a] only referred to instances where the article was delivered without the delivering USPS employee obtaining the signature on the Form 3811 at the time of delivery. [a] Are there any instances such as referred to in T1-2[a]? [b] If no, then is your response to T1-2[a] true but irrelevant information? [c] If yes, explain how the mailer would have knowledge that his return receipt did not represent an independent acknowledgment of the proof and details of delivery. [d] In order to confirm the accuracy of the data provided on a return receipt, is the mailer required, or is it even suggested or permitted, to check with the delivery office as indicated in your response to T1-2[a]/[b]? [e] If not, how can the mailer be sure of the accuracy of the data when it was not completed by the Postal Service? [f] If a dispute arises after a two year period, how can the data on the return receipt be confirmed? [g] Confirm that the mailer may include the special service number on a post/postal/stamped card that is included with the mailing as indicated in T1-2[b]. [h] If not, why not? [i] Confirm that the mailer may also include other data on the card such as the contents of the letter [which would make the receipt even more valuable]. [j] If not, why not? [k] Explain why you were not able to confirm T1-2[c] since I said either 20 or 22 cents. The postal cost of each of the types of cards is or is proposed to be 20 or 22 cents. [l] Your response to T1-2[d] is not responsive. What added services [other than the transmission of the card itself which is 20 or 22 cents for a similar card] is the Postal Service providing in the processing of return receipts when the return receipt is processed by the addressee without any action on the part of the Postal Service [other than the return of the card though the mail to the sender]? [m] If there are no added services, what is the justification for the added cost of between \$1.28 and \$1.30? [n] Is there a fault or negligence on the Postal Service, and therefore would a refund be appropriate, if the return receipt is not completed in accordance with the requirements of the DMMTB 932? [o] If not, why not?

RESPONSE:

- a-b) Without accepting the characterization of the response to DBP/USPS-T1-2(a), my understanding is that the DMMTB rules regarding the addressee's signature on Form 3811 should be followed.
- c) Not Applicable.

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d-e) No, it is not required, but the sender has the assurance of knowing that the information is there if it is needed.

f) It cannot be confirmed if the information is not retained after that time.

g-h) confirmed.

i-j) Confirmed in part. I do not know what value a mailer would place on any such card or if it would exceed the value of a return receipt.

k) Not confirmed. The mailer may incur a cost for a postcard in excess of postage.

l) Printing cost, the cost of returning a return receipt (including forwarding), carrier and clerk time, and window service time.

m) See response to (l), USPS-LR-SSR-104, and my testimony USPS-T-8 at 86-94.

n-o) See my response to DBP/USPS-T8-22.

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DBP/USPS-T8-16 [a] I do not understand the response to DBP/USPS-T1-3[c]. What date is permitted by the DMMTB to be shown if it is not the actual date of delivery? [b] What is the authority for requiring other than the actual date of delivery be shown? [c] In your response to T1-3[d], you refer to DMM Section S915.4.0, This refers to duplicate return receipts. How does this relate to my interrogatory? [d] Your response to T1-3[d] makes reference to USPS LR-SSR-137. As requested in my instructions, please provide me with a copy of the library reference. [e] Since the return receipt is being processed by the addressee in my interrogatory T1-3[e], explain which specific procedures are utilized by the Postal Service to ensure that the date of delivery as shown on the return receipt is accurate. [f] How would this procedure work since the return receipt is not being processed by a Postal Service employee?

RESPONSE:

a-b) See the revised response to DBP/USPS-T1-3 and Attachment 1 to that interrogatory.

c) Section S915.4.0 was cited because a duplicate can be requested if the date does not appear on the original.

d) This is available at the Postal Rate Commission and the USPS Library.

e) Assuming, without agreeing, that the situation you describe is true, the response of witness Larson to your interrogatory no. 20 in Docket No. R90-1 applies. The first paragraph of that response states:

Post Offices routinely monitor completion of return receipts by addressee agencies. In addition, if a number of customer complaints are received on any one agency's completion of return receipts, the agency is contacted and appropriate action is taken to resolve the problem.

f) See response to (e).

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DBP/USPS-T8-17 Your responses to DBP/USPS-T1-4 and T1-5 indicate that you have not conducted market research on this topic. [a] Is it your contention that formal market research must be conducted before you as an expert witness can have any idea as to why a customer may want to use a particular service? [b] If so, explain why you believe so. [c] If not, provide the responses to T1-4 and T1-5.

RESPONSE:

a-c) Not necessarily. However, DBP/USPS-T1-4 and T1-5 asked me for very specific information on return receipts from the perspective of the mailer. For example, T1-4(a) asked about the major reason a mailer would use return receipt service. Market research on mailers' reason for return receipt usage would be relevant on this subject.

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DBP/USPS-T8-18 Your response to DBP/USPS-T1-6 makes reference to USPS LR-SSR-137. As requested in my instructions, please provide me with a copy of the library reference.

RESPONSE:

See response to DBP/USPS-T8-16(d).

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DBP/USPS-T8-19 [a] Your response to DBP/USPS-T1-7[b] makes reference to USPS LR-SSR-137. As requested in my instructions, please provide me with a copy of the library reference. [b] Prior to the tagging of the certified mail label, what procedures did the Postal Service have to cull certified pieces before they reach the carrier? [c] Is that method still utilized on the mail which is processed on the 50 percent of the bar code sorters that do not have the certified mail detectors? [d] If not, what method is used? [e] What are the shortcomings in the methods utilized other than the certified mail detector? [f] How many bar code sorters are presently being utilized by the Postal Service? [g] Provide data with respect to the dates on which the bar code sorters with certified mail detectors were outfitted with the detector. If desired, this may be done in monthly intervals. [h] In your response to T1-7[e], I did not ask for a set implementation schedule. I only asked for an implementation schedule. Please provide. [i] If you are not able to provide any planned implementation schedule, explain why one has not been developed. [j] If no planning has gone into an implementation schedule, explain how certified mail can be considered a premium service. [k] How is certified mail in other shapes than letter size trapped prior to delivery? [l] Have any tests been conducted to determine the effectiveness of these procedures? [m] If so, provide data. [n] If not, why not?

RESPONSE:

- a) Please see response to DBP/USPS-T8-16(d).
- b) We depended on employees to recognize the green certified label and separate the certified article from the rest of the mail. For this reason, the certified label was designed to fold over the top of the envelope so that it could be readily identified when placed in trays or sacks. Although this method was adequate prior to automation implementation, with automation, it is not as efficient a way to physically segregate certified letter mail because fewer employees actually handle the mail. If the certified article is not segregated and

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routed to an accountable mail clerk, but is sent directly to the carrier for delivery, we rely on the carrier to visually identify the certified mail label and obtain a delivery record prior to delivery.

c-d) Yes.

e) See (b).

f) It is my understanding that as of September 9, 1996 the Postal Service had approximately 7,297 bar code sorters.

g) It is my understanding that as of September 9, 1996 the Postal Service had approximately 3,800 bar code sorters with certified mail detectors. These bar code sorters, which come with detectors, were installed as follows: 3 - 2/95, 12- 3/95, 4 - 4/95, 26 - 5/95, 61- 6/95, 56 - 7/95, 125 - 8/95, 155 - 9/95, 229 - 10/95, 285 - 11/95, 22 - 12/95, 344 - 1/96, 316 - 2/96, 338 - 3/96, 347 - 4/96, 356 - 5/96, 321 - 6/96, 379- 7/96, 326 - 8/96, 83 through 9/9.

h-i) There is no implementation schedule for retrofitting the other detectors at present. However, upgrade kits for the bar code sorters without certified mail detectors have now been obtained, and the Postal Service is beginning to conduct retrofit tests.

j) Please see my response to OCA/USPS-T8-46.

k) It is visually identified, manually segregated, and routed to an accountable mail clerk.

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I-n) No such tests have been conducted. Such tests are not needed since the carrier sorts these pieces.

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DBP/USPS-T8-20 Your reference to OCA/USPS-T8-6 and the DMMTB in response to DBP/USPS-T1-8 is not responsive. [a] If a return receipt was received back by a mailer and there was no new address shown on it, confirm that this could mean that the article had been delivered at the address shown on the mail. [b] If not, why not? [c] If a return receipt was received back by a mailer and there was no new address shown on it, confirm that this could mean that the article had been delivered at an address other than that which was shown on the mail and an error was made in failing to indicate this address change on the return receipt. [d] If not, why not? [e] Explain any other instances which could result in this condition. [f] Since there are a number of instances where different conditions could result in a similarly completed return receipt, wouldn't a greater level of service result if the Form 3811 had a place on it to check off that the delivery address was the same as shown? [g] If so, will this be changed? [h] If the response to [f] is no, explain why not? [i] If the response to [f] is no, explain how return receipts can be considered a premium service. [j] If the response to [g] is no, explain why not? [k] If the response to [g] is no, explain how return receipts can be considered a premium service. [l] Since the return receipt is being processed by the addressee in my interrogatory T1-8[a], explain which specific procedures are utilized by the Postal Service to ensure that the indication of a new address, if any, as shown on the return receipt is accurate. [m] How would this procedure work since the return receipt is not being processed by a Postal Service employee?

RESPONSE:

- a) Confirmed; the proposed change would require address delivered if different than the address on the mailpiece.
- b) Not applicable.
- c-e) The possibility of an error exists; however, with one uniform procedure for all return receipts, the procedure is simplified and it is reasonable to conclude that the risk of such problems is minimized.

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f) No, since the Postal Service proposal requires the information on the address if different from the one shown on the mail piece.

g) No; See response to f.

h) Because the proposed change already takes this issue into account .

i) See my response to OCA/USPS-T8-46. The Postal Service proposed change to the information provided on the return receipt provides an enhancement.

j) See response to f.

k) See response to i.

l) See the revised response to DBP/USPS-T1-3.

m) See response to l.

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DBP/USPS-T8-21 [a] Explain those instances where the Postal Service would not have received payment for a given return receipt in your response to T1-9[a]. [b] Under what authority is each of the instances described in [a] above authorized? [c] As an expert witness, are there any instances where in multiple deliveries the average time per return receipt would be less than the time for a single return receipt. [d] If not, why not? [e] As an expert witness, explain what volume of return receipts might be so high that the average time per return receipt would be greater than the actual time for the delivery of a single article. [f] As an expert witness, explain what percentage of multiple accountable mail deliveries you feel equal or exceed the value provided in [e] above. [g] In those instances where the average time for delivery is less than for a single piece, confirm that the average cost would also be less. [h] If not, why not?

RESPONSE:

- a) The instances where the Postal Service would not have received payment for a given return receipt could include when the mail is shortpaid or unpaid or when the mail could have been Postal Service mail for which no payment was received or the mail was government mail for which prepayment may not have been made.
- b) There is no authority for defrauding the Postal Service. Authority for penalty mail is found in the Postal Reorganization Act.
- c) I have not conducted a study of this practice.
- d) Not Applicable
- e) I have not conducted a study of this practice.
- f) See response to (e).
- g) I have not conducted a study of this practice.

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h) Not Applicable.

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DBP/USPS-T8-22 Your response to DBP/USPS-T1-10 relates to the article not being delivered as addressed through fault or negligence of the Postal Service. My question does not deal with the delivery of the article but with the lack of return receipt service being paid for and either not provided or not being properly provided. [a] Could a mailer obtain a refund of the return receipt fee which was paid if the article was returned to the sender regardless of the reason? [b] If the response to [a] is not yes, explain and specify specific reasons for returning the mail that would be acceptable and those which would not be acceptable. [c] Could a mailer obtain a refund of the return receipt fee which was paid if the return receipt was not received? [d] If not, why not? [e] Could a mailer obtain a refund of the return receipt fee which was paid if the duplicate return receipt indicated that there was no record of delivery of the article? [f] If not, why not? [g] Under the conditions mentioned in [e], would this also permit the refund of the certified mail fee? [h] If not, why not? [i] If your answers to [a] [c] [e] and [g] are not yes, explain what services the Postal Service would have provided in each no response to justify the retention of the fee.

RESPONSE:

Mailers may request refunds in these circumstances, but as explained in my response to DBP/USPS-T1-10, all refunds are available subject to the discretion of the Postal Service. See DMM S915.1.6 and DMM P014.2.4.

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DBP/USPS-T8-23 [a] Regarding your response to DBP/USPS-T1-11[a], confirm that an improvement to the return receipt service has been to add a new "print name" block on all accountable mail signature forms. [b] If not, explain. [c] If so, what issue date of PS Form 3811 contains this feature? [d] Have post offices been advised to discontinue the use of previous issues of the form? [e] If not, why not? [f] Confirm that even though the Postal Rate Commission felt that there was a suggested deterioration of return receipt service which should be of concern to the Service [Docket R90-1 Recommended Decision issued January 4, 1991 - Footnote 110 - Paragraph 6576], there has been no need to conduct a study to determine the quality of the return receipt service and/or the extent to which it complies with the DMM and other requirements? [g] If so, explain why the Postal Service feels that a study is not appropriate. [h] In light of your response, explain how return receipt service may be considered a premium service. [i] If not, provide details and copies of the study. [j] Explain how the selective check made in accordance with DMMTB 913.73 will indicate compliance in those instances where the accountable mail is delivered to the addressee with the return receipt on it and where it is up to the addressee to complete the return receipt after delivery. [k] What controls exist to ensure that all offices with carrier delivery service complete the required quarterly check. [l] Please provide me with the copy of the Form 3871 for the Washington DC post office for the last 12 month period. [m] Does DMMTB 913.73 apply to all accountable mail or only to insured mail since it is in that section? [n] If it only applies to insured mail, what percentage of all return receipts are utilized on insured mail?

RESPONSE:

- a) Yes.
- b) N/A
- c) 12/94
- d) See revised response to DBP/USPS-T1-3 and attachment.
- e) N/A

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f-g) The alleged deterioration of the quality of return receipt service cited in the Commission's Opinion and Recommended Decision in Docket No. R90-1 was not based upon an independent study, but rather anecdotal information. The Postal Service has taken the corrective actions, including the addition of a new "print name" block on PS Form 3811 and increased emphasis on procedures (See revised response to DBP/USPS-T1-3).

h) See response to OCA/USPS-T8-46.

i) N/A

j) See response to (d)

k) I know of no controls, however, see revised response to DBP/USPS-T1-3.

l) The Postal Service has no information responsive to this request.

m) The form itself refers to insured and returned C.O.D. mail.

n) In FY95, there were a total of 240,734,553 return receipts. 701,151 return receipts with basic option accompanied insured mail; 5,594 return receipts with enhanced option accompanied insured mail.

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DBP/USPS-T8-24 In your response to DBP/USPS-T8-1, [a] confirm that all registered mail is First-Class Mail or Priority Mail and therefore is sealed against postal inspection. [b] If not, why not? [c] Confirm that the Postal Service does not have the authority to open a registered article to determine its value, [d] If not, why not? [e] Confirm that for registered mail with insurance there are different prices based on the value of the article between no value and \$25,000 [obviously in various increments]. [f] If not, explain. [g] Explain why the minimum value for registered mail with insurance is \$0.00 rather than \$0.01. [h] What insurance can a customer claim if the value is indicated as \$0.00? [i] If you confirm part [e], provide a listing of the added costs that are incurred by the Postal Service for each of the incremental added fees. For example, what are the added costs to the Postal Service to justify the added 45-cent fee for a \$500 value vs. a \$100 value article? [j] If your response to part [i] indicates added costs related to providing greater security or care or any other items other than the larger costs of paying the claims, specify exactly what greater security [as well as any other item you may list in [i]] is provided for each of the 26 rate steps above the minimum \$0.00 to \$100 rate of \$4.95. In other words, what greater security [or any other item mentioned in [i]] is provided for a \$500 article over that which is provided for a \$100 article? [k] Same as [j], except for \$1,000 article over a \$100 article. [l] through [jj] Same as [j], except for each of the \$1,000 increments starting at \$2,000 and ending at \$25,000. [kk] Confirm that all registered mail articles are marked in the same way, namely with a red numbered sticker and postmarking the flaps. [ll] If not, explain. [mm] Confirm that it is permissible to affix more postage to mail than that which is required. [nn] If not, why not? [oo] Confirm that it is possible for stamps once affixed to an article to fall off during transit [without any penalty for the article being short paid]. [pp] If not, why not? [qq] Confirm that the amount of postage appearing on a registered mail article will not provide an accurate way of always telling the value of the article. [rr] If not, why not? [ss] For articles valued between \$100.01 and \$25,000, how is this need for any special security or care or any other item mentioned in [i] communicated as the article passes through the system to delivery? If you are not able to respond for the entire \$100.01 to \$25,000 range, provide separate responses for each range. [tt] Provide copies of any regulations, directives, memoranda, etc. which outlines the special security or care or any other item listed in [i] that is provided for articles having a value up to \$25,000. [uu] Confirm that for articles having a value of between \$100.01 and \$25,000 for which the mailer does not desire postal insurance under the present registered mail rates would pay a fee of 20-cents to \$2.70 less than would be paid if postal insurance was desired. [vv] If not, why not? [ww] Confirm that there are instances where a mailer already has commercial

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insurance or other reasons why postal insurance is not needed or desired. [xx] If not, why not? [yy] If so, confirm that this mailer would be required to pay the added 20-cents to \$2.70 registry fee to purchase an insurance service that is not needed or desired. [zz] If not, why not? [aaa] Confirm that registered mail consists of two basic services, namely, provision of a secured transmission of the mail including the assignment of a number to the article which allows for record keeping and return receipt service and the provision of insurance service. [bbb] If not, explain. [ccc] Since you have made comparisons to other industries, confirm that in the telephone industry there is an unbundling of various services, such as separation of long distance service [inter-LATA tolls], short distance service [intra-LATA tolls] and local service. [ddd] If not, why not? [eee] If this is so, why is the Postal Service going the other way and bundling its costs - combining both secure transmission and provision of insurance?

RESPONSE:

- a) Confirmed.
- b) Not applicable.
- c) Confirmed, but see DMMTB 911.254.
- d) Not applicable.
- e) Confirmed.
- f) Not applicable.
- g) For convenience and simplicity of the fee schedule. As the category of declared value of \$0.00 to \$100 for pieces not desiring postal insurance would include the value \$0.00, and that category is inclusive of the declared value of

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\$0.01, for simplicity, the chart does not differentiate for registry service with insurance.

h) None.

i-jj) Although I am unable to identify specific figures in the \$0-\$25,000 value increments for which costs vary, registered mail handling procedures vary depending upon the declared value of the article, such as use of routing methods, use of security safes, use of hand-to-hand receipts, and transportation methods, and these factors may influence costs.

kk-ll) Confirmed that all the registered pieces bear a red postal- or mailer-supplied registry label; not confirmed that all registry pieces bear postmarking on "the flaps".

mm) Confirmed, although unlikely, given that it is presented to a postal employee at the time of acceptance. See DMM S911.1.3. As a result, a precise determination of the correct postage may usually be made in the presence of a USPS employee.

nn) Not applicable.

oo) Confirmed.

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pp) Not applicable.

qq-rr) Not confirmed. It is a reasonable method. See also response to (mm).

ss-tt) See attachment.

uu) Confirmed.

vv) Not applicable.

ww) Confirmed.

xx) Not applicable.

yy) This is possible, however, as explained in USPS-T-8 at pp. 20-21, uninsured registry volume is relatively small. Additionally, commercial insurance may impose deductibles which, unlike postal insurance, would not provide full reimbursement.

zz) Not applicable.

aaa) Not confirmed.

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bbb) The term "registry" in this subpart is used without identifying whether it is insured or uninsured registry. Uninsured registry provides security and accountability but does not share the insurance characteristic of insured registry.

ccc) It is my understanding that for some customers, some telecommunications services may be purchased separately.

ddd) Not applicable.

eee) See USPS-T-8 at pp. 5-26.

Chapter 4 Dispatching

410 To And From Stations And Branches (Including Contract Stations)

411 Preparation

Make up all registered mail transmitted to or from main offices and a station or branch in rotary lock pouches and handle as a hand-to-hand transfer. Use hand-to-hand transfer whenever possible. Make up registered articles dispatched from a contract station in a registry jacket, rotary or numbered seal pouch or container envelope, as appropriate.

412 Delivery By Motor Vehicle Operator

Where possible, the motor vehicle operator will deliver registered mail to the registry section. Otherwise, an employee of the registry section must be assigned to the platform or dock area to accept registered mail from the driver.

413 Security Of Exchange

An arrangement must be made at each installation to provide a secure exchange of registered mail between motor vehicle operator and the registry section on a hand-to-hand basis.

420 Dispatching

421

Obtain receipt from the dispatch unit in duplicate. Leave one copy of the bill with the articles and retain the other in the registry section.

422

Dispatch units should retain copies of dispatch bills on file.

423

When registry section employees are not used as dispatchers, an employee of the outgoing mail section may be designated to pouch registered mail and make dispatches.

424

The employee who actually pouches mail should sign for the entries on the mailing section copy.

425

Bill rotary lock or numbered seal pouches to the sectional center facility (SCF) in the following manner:

a. Bill up to eight pouches to a single SCF on Form 3830A. Place Form 3830A in a P-9 envelope attached to one of the pouches.

b. Bill more than eight pouches to a single SCF on Form 3854 in triplicate. Place two copies of the bill and a return addressed envelope in a P-9 envelope attached to one of the pouches. Receiving offices will postmark and sign the copies and return one copy to the dispatching office.

430 Hand-To-Hand Receipts

431 How To Use Hand-To-Hand Receipts

When a hand-to-hand receipt is exchanged in transferring custody of rotary lock pouches, numbered seal pouches, and outside registered pieces, enter the particulars of the pouches and outside pieces on a dispatch bill, in duplicate. Deliver one copy of the bill with the registered mail. The accepting employee should check the particulars of the rotary lock pouches, numbered seal pouches, and outside pieces against entries on the bill at the time of transfer. Obtain a descriptive receipt from the person to whom delivery is made. The postal employee conveying registered mail shipments may assist the receiving postal employee in checking registered articles against the bills, if requested to do so by the receiving employee. Under exceptional conditions, when available time does not permit descriptive checking of rotary lock pouches, numbered seal pouches, and outside pieces, the dispatch may be accepted by count. Under these conditions, the dispatch may be transferred with the understanding that full particulars will be checked against entries on the bill as soon as possible after actual transfer.

432 When To Use Hand-To-Hand Receipts

Exchange hand-to-hand receipts in the following instances:

a. All dispatches between mail offices and stations and branches.

b. When large volume of registered mail is exchanged directly by postal employees between postal units.

c. The declared value of an individual shipment meets the coded value requirement set forth in special instructions issued by Headquarters to Regional Postmasters General. (Issued on a need to know basis).

d. The aggregate value of a particular dispatch warrants such handling as determined by the superintendent of the registry section at the point of origin to the first transfer

point. Where hand-to-hand receipts are used, endorse these receipts to show only those points between which the hand-to-hand receipts are used for the particular dispatch involved. Follow specific instructions for coded value shipments as outlined in the "Limited Official Use" Coded Shipment Instructions dated January 1, 1978.

440 Bus Service

Dispatch only registered mail of minimum value in iron lock pouches via bus service. Do not dispatch outside registered articles via bus service unless authorized by the Regional General Manager Logistics Division.

450 Air Taxi Service

451 Restrictions

Dispatch only registered mail of minimum value in iron lock or snap-seal pouches transported via air taxi service. Do not dispatch valuable registered mail (such as negotiable securities or currency shipments) and outside registered articles via air taxi service, unless specifically authorized by the Regional General Manager Logistics Division.

452 Commercial Air Transportation

The operational and security procedures for the dispatch of registered mail via commercial air transportation are outlined in the "Restricted Information Con-Con Instructions" dated March 1, 1981.

460 Request For Special Routing

Post offices originating a shipment that meets the criteria for a coded shipment or high value shipments for which a routing has not been established on Form 5167, *Routing and Protection For Coded and High Value Shipments*, should request routing instructions from the Director, Logistics Division. Use Form 5168, *Coded Value and High Value Registered Mail—Dispatch Instructions*, to record the pertinent information.

470 Records Of Dispatches

471 Returned Dispatch Card

Check the dispatch records *daily* to ensure that all dispatches have been accounted for satisfactorily. When Form 3830A is used and the dispatch receipt card is filed with the dispatch record, the date of the return of the dispatch card need not be noted on the dispatch record. Attach returned copies of dispatch bills promptly to the office dispatch record and file.

472 Non-Receipt Of Dispatch Record

If a receipt is not received for a dispatch within two days after the time it is normally expected, send a duplicate card or dispatch bill with Form 3829, *Registered Dispatch Follow-*

Up, to the installation to which the dispatch was made. If appropriate, make telephone inquiry. If inquiry reveals non-receipt, report the matter promptly to the Postal Inspector-in-Charge by telephone, followed by written memorandum. Make appropriate notation on office copy of dispatch record.

473 Delayed Returns of Dispatch Receipts

Report consistent delays in return of dispatch receipts from any installations to the district manager of the district involved.

474 Missing Articles

If a report of a missing article is received from the office to which billed, ascertain whether the article is on hand or was dispatched to a unit other than the one reporting failure to receive it. If not, promptly telephone a report to the Postal Inspector-in-Charge.

480 Convoy Service

481 Loading

All registered mail dispatches (except those requiring hand-to-hand receipt) for transportation via highway contract route, mail messenger or air taxi, whether enclosed in rotary lock or numbered seal pouches, *must be accompanied by an employee from the registry section or pouching area to the loading platform*. The employee must remain there until loading is completed and the doors of the vehicle are locked. When it is determined advisable by management, the employee may be authorized to deliver the pouches to a responsible designated employee on the platform after identifying dispatches which are to be made. The registry employee must make a record of the name of the responsible employee assuming custody of the dispatch.

482 Applicability

These instructions do not apply at post offices where no employee is on duty at the departure time of the highway contract carrier or mail messenger trip.

483 Coded Value Shipments

Instructions on convoy service for registered mail dispatches of coded value which require hand-to-hand receipts are issued by the Regional General Manager, Logistics Division. They are subject to the approval of the appropriate Regional Chief Postal Inspector or Designated Postal Inspector-in-Charge.

484 Security Guards

Employees, other than security guards in uniform, assigned to perform convoy service should wear their official postal identification in full view.

532 Sack Jackets

Open the pouch and hold the seal and label until the contents have been satisfactorily accounted for. Follow the instructions pertaining to rotary lock pouches.

533 Registry Envelope Containers

Cut label 89 along the edge of the flap on the envelope and remove the contents. Carefully examine opened containers to make sure all registered articles have been removed. Check the registered articles against the entries on the enclosed dispatch card or bill. Examine the condition of individual articles. Check the number entered on Label 89 with the number on the dispatch card or bill. The numbers should be identical. Complete, sign (surname and initial), and postmark the card or bill. RETURN THE CARD RECEIPT PORTION OR THE BILL COUPON TO THE DISPATCHING UNIT BY THE NEXT MAIL. If there is any irregularity, call a supervisor immediately. Note discrepancy on both portions of the card or bill. Both the supervisor and the clerk must sign the card or bill. Do not permit a registry envelope container that has been removed from an iron lock or snap seal pouch to pass through a postal unit without being opened. Dispose of unserviceable envelopes as waste.

534 Registry Jackets

Open the jackets and remove the contents. Carefully examine jackets to make sure all registers have been removed. Check the registered articles against the enclosed dispatch bill. Destroy all the jackets except those connected with irregularities. If there is an irregularity, call a supervisor. Note discrepancy on both portions of the bill. Both supervisor and clerk must sign the bill. Hold out the jacket.

535 Outside Registered Articles

Remove the dispatch card from the P-11 envelope attached to the article. Check the article against the entry on the bill. Examine the condition of the article. Complete, sign (surname

and initial) and postmark the card. Return the card receipt portion to the dispatch unit by the next mail. If there is an irregularity, call a supervisor. Note discrepancy on both portions of the card or bill. Both supervisor and clerk must sign the card. Do not remove the P-11 envelope from the article.

536 /Reserved/**537 Valuable Mail**

Transfer valuable articles to the employee in charge of the vault or safe. Obtain his receipt. Local management will determine the minimum value for articles to be transferred to the vault or safe.

538 Emergency Opening

If the post office or other unit to which the pouch is addressed has no rotary lock key, or has a defective key, or if a rotary lock is damaged and cannot be opened, DO NOT CUT THE LEATHER STRAP. Cut the side seam of the pouch, beginning about six inches from the bottom and extend upward only as far as necessary to remove the registers, but not closer than six inches from the top hem. If the pouch seam is cut or the leather strap is accidentally broken, cut, or otherwise damaged in opening, the pouch must be immediately removed from service. For every pouch removed from service under the above conditions, endorse the coupon of the bill to show the action taken, and return the coupon to the dispatching office. Send the pouch, and an explanatory note containing the lock number and the reason for opening, to the nearest mail bag depository. A copy of the explanatory note must be immediately forwarded to the nearest Postal Inspector-in-Charge.

731.2 Responsibility

Handle registered mail so that individual responsibility can be fixed, consistent with instructions in this handbook. The Superintendent, Registry has the authority to permit area responsibility at an office when the cost of individual responsibility is prohibitive. (*Exception:* Where service counter activities are combined, registered mail must be handled in such a manner that individual responsibility for the registered mail can be fixed). In an office where a Superintendent, Registry is not assigned, the postmaster must obtain approval for area responsibility from the General Manager, Accounting and Revenue Protection Division at the Regional Office. Area responsibility occurs when a group of employees, rather than an individual employee, is responsible for the registered mail. The group must be kept to a minimum and Form 1625 must be used to record all employees working registered mail.

Area responsibility *may be used* (with permission) for all registered mail when the mail is worked by itself, or with other accountable mail, in an area enclosed by wire screen partitions.

Area responsibility *may be used* (with permission) for incoming and notified registered mail when the mail is worked by itself, or with other accountable mail, in an area *not* enclosed by wire screen partitions, if the area is separated from the mainworkroom by cases or other means.

731.3 Notified Mail

All mail not assigned to carriers or delivered to customers on the day that it arrives must be treated as notified mail. Notified mail must be kept in locked containers, employees must sign for the key(s) to the locked container(s) daily, and all notified registered mail must be accounted for at the end of each business day.

731.4 Unaccounted For Registered Mail

Immediate notification must be made to the Postal Inspection Service whenever a piece of registered mail is unaccounted for.

732 Internal Protection

The following special rules apply only to internal handling in a stationary postal unit.

a. Provide a safe, vault, separate cage, or locked container. Assign an employee or employees to be responsible for valuable registered mail. Do not permit other employees to have access to this unit.

b. Determine, on the basis of local conditions, the value of articles to be placed in the valuable unit. This determination is the responsibility of the postmaster. However, this value cannot be less than \$1,000. *Note:* The term valuable as defined here is not to be used as a guide to dispatching or to carrier delivery.

c. Transfer valuable mail to and from the valuable unit by receipts, showing the number for individual pieces or full particulars of rotary-lock pouches. Keep a record on Form 3854 of the valuable articles and pouches in the unit.

d. While registered mail is in the valuable unit, use Form 3810, *Reminder Record*, in the dispatch or delivery sections as a reminder. Each registered article should be listed on a separate Form 3810. When the dispatch or delivery employee retrieves the listed article from the clerk, he initials the 3810 opposite the article listed and leaves the 3810 with the clerk. Articles which have been retrieved from the vault will be lined off the 3810 and the 3810 will be reused.

e. At offices operating on a tour basis which have a separate valuable cage, make a balance at the end of each tour. The balance will cover only the registered articles in the valuable cage. Use Form 3875, *Daily Balance—Registry Section*, for this purpose. The employee in charge of the valuable unit must obtain a receipt for the valuable articles from the responsible employee in the succeeding tour. Tour receipts must be approved and filed by the supervisor.

f. Report serious discrepancies in handling valuable registered mail to the Postal Inspector-in-Charge, or to the local postal inspector, by telephone or telegraph.

733 Postal Employees' Responsibility

Postmasters and other postal employees will be held personally responsible for the wrong delivery, depredation, or loss of any registered mail due to negligence or disregard of instructions.

734 Inspection Of Damaged Mail

To comply with the instructions concerning sanctity of the seal on First-Class Mail, a damaged, registered article must not be examined more than necessary to determine the extent of damage.

740 Claims Acceptance Procedures

741

Handle claims for loss, damage or rifling in accordance with DMM, 149.

742

Customers filing damage claims must present the damaged article, the wrapper and the packaging at the time the claim is filed.

743

A complete description of the damage to the article, the outside container and the interior packing must accompany the claim file.

744

Claims for rifling or total loss of contents must be accompanied by the envelope or packaging allegedly rifled.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
NEEDHAM TO INTERROGATORIES OF DAVID B. POPKIN

DBP/USPS-T8-25 [a] In your response to DBP/USPS-T8-3[b], confirm that you would have been able to confirm the statement if I had also included single piece Standard Mail [A]. [b] If not, why not? [c] My T8-3[c] and [d] relate to a comparison of the rates for a \$5,000 value article being sent Standard Mail - Insured vs. Priority Mail - Registered. The weight - zone - type cells that I referenced are where the Standard Mail - Insured rate was less than the Priority Mail - Registered rate was only for a 69 and 70-pound parcel destined to the 5th zone intra-BMC. Confirm. [d] If not, explain. [e] List any other weight - zone - type cells where Standard Mail - Insured rate would be less than the Priority Mail - Registered rate. [f] What percentage of all insured packages fall into the particular weight, zone, and type as those cells enumerated in response to parts [c] and [e]? [g] While you may not have studied the data required for response to T8-3[e], forward this to another USPS employee or witness who is able to confirm that Priority Mail will receive better delivery service than Standard Mail. [h] If not, explain. [i] As an expert witness, explain why a knowledgeable mailer might choose to utilize the more expensive Standard Mail - Insured rate over the less expensive Priority Mail - Registered rate which exists in all circumstances other than those specified in [c] and [e] since the mail would receive more secure and expeditious handling. [j] As an expert witness, explain why these rates are reasonable when they produce these anomalies?

RESPONSE:

a) Confirmed.

b) Not applicable.

c) Confirmed.

d) Not applicable

e) Not applicable

f) The Postal Service has no available data or documents responsive to this request. Given the constraints in the question, however, I suspect this would constitute a very small percentage of insured volume.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
NEEDHAM TO INTERROGATORIES OF DAVID B. POPKIN

g) See attachment to my response to OCA/USPS-T8-32.

h) Not applicable.

i) A mailer may consider a variety of factors when determining which subclass to use, such as mail preparation requirements, mail content restrictions, limitations on point of acceptance, speed of delivery, security, and accountability.

j) They are not anomalies. See response to (i). The two services are not necessarily interchangeable.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
NEEDHAM TO INTERROGATORIES OF DAVID B. POPKIN

DBP/USPS-T8-26 To clarify my DBP/USPS-T8-4[c], assume that I, as an individual mailer, have a ten pound parcel valued at \$5,000 to ship. [a] Confirm that PO to Addressee Express Mail would be \$29.80. [b] Confirm that Priority Mail would be \$7.80 to \$14.05 depending on destination. [c] Confirm that the registration fee would be \$7.65. [d] Confirm that the insurance fee would be \$40.50 [for Express Mail]. [e] Confirm that Express Mail would provide a guaranteed one to two day delivery. [f] Confirm that Priority Mail would provide a likely delivery of one to three days. [g] Explain any nonconformation. [h] My original interrogatory asks why if I wanted to expedite the delivery time of my parcel by changing it from Priority Mail to Express Mail, I would have to pay both the additional \$15.75 to \$22.00 to upgrade from Priority Mail to Express Mail as well as the additional \$32.85 to receive the insurance protection. As an expert witness, explain how this can be perceived as being reasonable that I would have to pay an additional \$32.85 for the insurance protection while also losing the security feature of registered mail.

RESPONSE:

These responses assume adoption of the Postal Service's proposals.

a) Confirmed.

b) Confirmed.

c) Confirmed.

d) Confirmed.

e-g) See attachment to my response to OCA/USPS-T8-32.

h) See response to DBP/USPS-T8-25(i). Mailers need for security, speed of delivery, and insurance protection may depend upon the circumstances. It is, therefore, not unreasonable for mailers who desire speed and insurance to use Express Mail with insurance.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
NEEDHAM TO INTERROGATORIES OF DAVID B. POPKIN

DBP/USPS-T8-27 Regarding your response to DBP/USPS-T8-6, [a] confirm that the average of a listing of items is determined by adding up the items in the list and dividing by the number of items in the list. [b] If not, explain. [c] If I must know the individual items to obtain the average of them, why is the answer to by T8-6[a] not available when the average is known? [d] What was the maximum valid claim made in FY 1995? [e] Your response to DBP/USPS-T8-6[a] makes reference to USPS LR-SSR-109. As requested in my instructions, please provide me with a copy of the library reference.

RESPONSE:

a-b) A simple arithmetic average is computed in this way.

c-e) A copy of the relevant page is attached. The average document reconstruction claim paid in FY 1995 was \$88.73 ($\$71,550.66 / 810$). Although data on highest payable claims are not tracked, a search of USPS records was conducted. The highest paid claim for document reconstruction in FY 1995 was \$15,000. The next highest claim was \$1,588.18. There were a total of 12 claims that exceeded \$500, constituting 1.48 percent of all paid claims. Excluding the highest claim, the next 11 highest claims exceeded the proposed \$500 maximum limit by an average of \$279.26.

U. S. POSTAL SERVICE
D O M E S T I C
CLAIMS PAID BY CATEGORIES (D-4)

DATE 09/28/95 TIME 16.48.49
PAGE 1
QTR 04 FY 1995

CLAIM CATEGORY		PAID THIS QTR		PAID THIS F/Y	
		NUMBER	AMOUNT	NUMBER	AMOUNT
DOMESTIC REGISTERED	LOST	310	777,441.69	1,047	3,276,189.07
	DAMAGED	248	176,569.66	786	547,099.39
	NO-REMIT	01	13.53	06	609.37
	TOTAL	559	954,024.88	1,839	3,823,897.83
C.O.D.	LOST	9,858	620,738.60	29,959	2,182,629.29
	DAMAGED	564	29,916.47	1,738	95,669.92
	NO-REMIT	492	39,196.79	1,384	122,780.14
	TOTAL	10,914	689,851.86	33,081	2,401,079.35
DOMESTIC INSURED	LOST	16,456	2,071,381.28	54,075	6,897,340.41
	DAMAGED	15,303	1,612,698.42	50,601	5,279,703.39
	TOTAL	31,759	3,684,079.70	104,676	12,177,043.80
EXPRESS MAIL-MERCHANDISE	LOST	615	109,554.19	2,191	388,088.74
	DAMAGED	580	63,832.56	1,785	217,077.93
	DELAY	00	.00	01	50.00
	TOTAL	1,195	173,386.75	3,977	603,216.67
EXPRESS MAIL-RECONSTRUCTION	LOST	210	14,256.33	658	62,383.01
	DAMAGED	08	540.47	33	2,436.72
	DELAY	37	1,849.96	119	6,730.93
	TOTAL	255	16,646.76	810	71,550.66
DOMESTIC TOTALS **		44,682	5,517,989.95	144,383	19,076,788.31

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
NEEDHAM TO INTERROGATORIES OF DAVID B. POPKIN

DBP/USPS-T8-28 Regarding your response to DBP/USPS-T8-7, you indicate that you have not studied this topic. [a] Has any other USPS employee or consultant studied this topic? [b] If so, provide their response to the interrogatory.

RESPONSE:

a) No.

b) Not applicable.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
NEEDHAM TO INTERROGATORIES OF DAVID B. POPKIN

DBP/USPS-T8-29 Regarding your response to DBP/USPS-T8-8[b], [a] explain how a mailing of merchandise would not qualify for one of the applicable Standard Mail subclasses. [b] If I have a four ounce package containing merchandise, confirm that I may mail it by First-Class Mail for \$1.01, by Standard Mail [A] for \$1.01, or by Priority Mail for \$3.00. [c] If not, explain. [d] Confirm that for the return receipt for merchandise service it would only be available for the Standard Mail [A] and Priority Mail rates under the proposal while presently it is available for all three categories. [e] If not, explain. [f] Confirm that the delivery standards for Standard Mail [A] are slower than for First-Class Mail or Priority Mail. [g] If not, explain. [h] Confirm that under the proposed rules for my 4-ounce package for which I desire to obtain a return receipt for merchandise, I must either deliberately slow up the delivery time by changing it from First-Class Mail to Standard Mail [A] - even though the rates are the same or I must pay an additional \$1.99 to pay for the Priority Mail rate. [i] If not, explain. [j] As an expert witness, how can this be perceived as being reasonable?

RESPONSE:

a) See response to DBP/USPS-T8-25(i). For example, it would not qualify if correspondence were also included therein.

b-c) Confirmed, assuming your reference to First-Class Mail refers to the Letters and Sealed Parcels Subclass and assuming the piece is mailable and the contents meet eligibility requirements.

d-e) Not confirmed. Under the proposal, return receipt for merchandise may also be available for other Standard Mail. In addition, as noted on page 74 of my testimony (USPS-T-8), return receipts for merchandise sent by other mail subclasses would still be available through either certified or insured mail with return receipt service.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
NEEDHAM TO INTERROGATORIES OF DAVID B. POPKIN

f-g) See attachment to my response to OCA/USPS-T8-32.

h-j) Not confirmed. See response to (a). See also Tr. 4/1299-1300.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
NEEDHAM TO INTERROGATORIES OF DAVID B. POPKIN

DBP/USPS-T8-30 Regarding your response to DBP/USPS-T8-9 [b], [a] what is the definition of a philatelic card product. [b] Where in the regulations or Classification Schedule does this definition appear? [c] Provide me with a copy of any regulations, directives, or memoranda which contain the definition of a philatelic card product. [d] Confirm that Section 222.11 of the Classification Schedule defines a Postal [presently] / Stamped [proposed] Card as A postal/stamped card is a card with postage imprinted or impressed on it and supplied by the Postal Service for the transmission of messages. [e] If not, explain. [f] Is a philatelic card product a card? [g] Does a philatelic card product have postage imprinted or impressed on it? [h] Are philatelic card products supplied by the Postal Service? [i] May philatelic card products be utilized for the transmission of messages? [j] Explain any negative answers to parts [f] through [i]. [k] Does a philatelic card product meet all of the requirements to qualify it as a Postal/Stamped card as specified in the Classification Schedule? [l] If not, why not? [m] What is the pricing of philatelic card products? [n] What is the authority for pricing philatelic card products different than Postal or Stamped cards? [o] What is the name and title of the Postal Service officer or employee who is responsible for pricing philatelic card products at a price which is different than postal/stamped cards?

RESPONSE:

a-c) A product description can be found in the attachment from the Stamps, Etc. catalog. There is no classification language.

d-e) Not confirmed. Your question is phrased in the present tense and lacks quotation marks.

f) See (a)-(c) above.

g) Yes, but it may be sold with a cancellation.

h) Yes.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
NEEDHAM TO INTERROGATORIES OF DAVID B. POPKIN

i-l) Not necessarily. Some are sold with the postage canceled; others are used for collection purposes only.

m) See attachment.

n) I presume it is the Postal Reorganization Act.

o) I do not accept your characterization that postal or stamped card prices must apply to these cards. Pricing for these cards is managed by the office of Stamp Services.

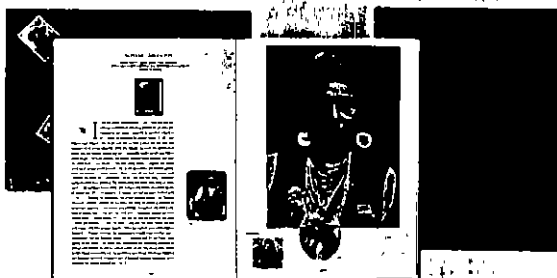
SPECIAL COLLECTIBLES

SPACE ACHIEVEMENT
COMMEMORATIVE SOUVENIR

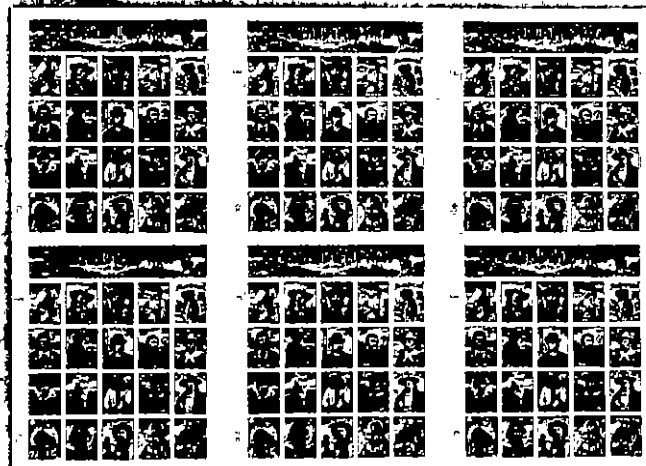
MOON LANDING PRINT

LEGENDS OF THE WEST
FIRST DAY CEREMONY PROGRAMLEGENDS OF THE WEST
POSTAL CARD SET

LEGENDS OF THE WEST MINT SET



LEGENDS OF THE WEST UNCUT SHEET



MOON LANDING COLLECTIBLES

Product	Price (\$)	Item No
(A) Space Achievement Souvenir (includes a \$9.95 Moon Landing stamp that traveled on the Endeavour, a special envelope, and a cancelled 29¢ Moon Landing stamp)		
Unsigned version	25.00	9859
Signed by the envelope artist (limited to 10,000)	69.00	9862
(B) Moon Landing stamp print (a 12"x16" print including four 29¢ stamps cancelled with the first day of issue postmark)	14.95	9853

Please refer to the "Special Stamps" section on page 22 for other space-related stamps.

All Legends of the West and Moon Landing collectibles are available only while supplies last.

LEGENDS OF THE WEST COLLECTIBLES

Product	Price (\$)	Item No.
(C) First Day Ceremony Program (with protective cover)	5.95	9925
(D) Postal Cards Set of 20	7.95	9926
(E) Legends of the West Mint Set	24.95	08826
(F) Limited Edition uncut sheet of stamps (six full perforated Legends panes)	34.80	9922
"Best of the West" Collection at 10% savings (Commemorative Edition, Postal Card Set and Ceremony Program)	34.95	9923

SUPPLIES ON THESE ITEMS ARE LIMITED,
TO ORDER, CALL 1 800 STAMP24

COMIC STRIP COLLECTIBLES

From 7 to 70, kids of all ages love the comics. Which is why anyone you know is sure to love these Comic Strip Classics stamps and collectibles. There's no better time of year to pick one up for someone—it's sure to bring a smile to their face.

(A) STAMP PANE 32c

Issued 10/1/95 at Boca Raton FL

The comic strip is one of the few truly American art forms. From thousands of original comic strip panels, designer Carl Herrman has developed 20 beautiful and memorable comic images—and a beautifully designed pane for our Classic Collection stamp series.

Pane of 20 w/plate no 6.40 5523

(B) FIRST DAY CEREMONY PROGRAM

Printed on newsprint to capture the flavor of the funnies, this unique program includes some of the strips that made these comics famous. It's from a limited print run issued at the first day ceremony in Boca Raton, Florida, and includes a pane of 20 stamps with first day cancellations—plus the ceremony agenda and list of program participants. A true collectible for anyone with an interest in stamps or comics.

9.95 8925

(C) POSTAL CARD SET

This keepsake postal card set features full-color reproductions of all 20 stamps in the series, displaying beautiful renditions of Popeye, Blondie, Li'l Abner, Alley Oop, Dick Tracy and all the rest. 20¢ postage is included on the address side of each card.

Set of 20 postal cards 7.95 8926

With first day cancellations 9.95 89266

(D) COMIC STRIP MINT SET

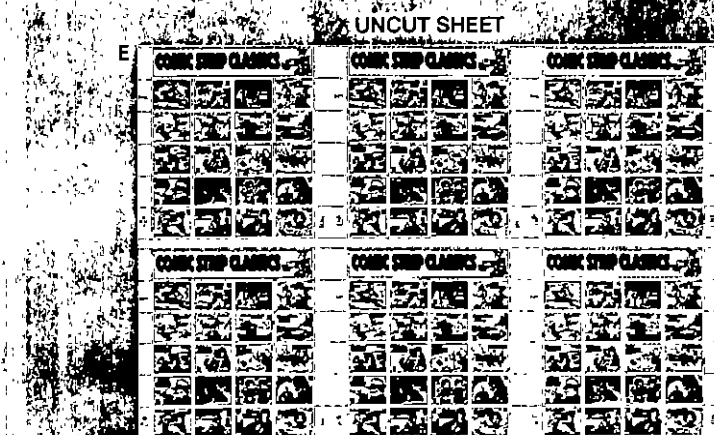
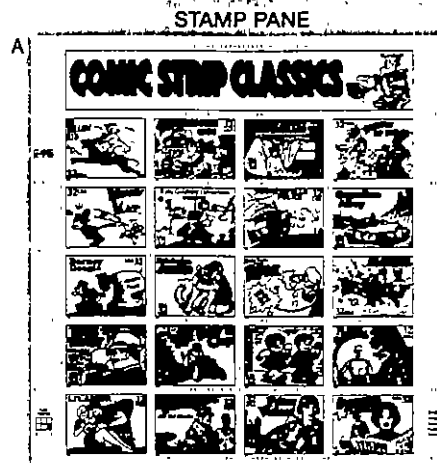
Author Richard Marschall (owner of the largest private collection of comic strip memorabilia in the world) was commissioned by the United States Postal Service to write the definitive companion piece to our Comic Strip Classics stamps. This 96-page softbound volume features the stories behind the comic strips and their creators—plus reproductions of actual strips from the golden era of comics. You'll also learn how each of the stamps in this set was selected for the series, and why each one is considered a genuine American classic. Included as part of this volume are two full Comic Strip Classics stamp panes.

24.95 8923

(E) UNCUT SHEET

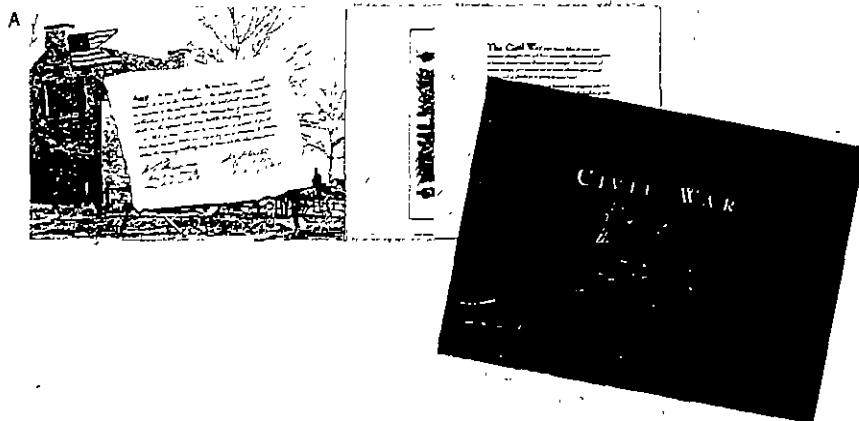
Like our other Classic Collection issues, this one is available as a collectible sheet—perforated but uncut. It's six full "funny pages" you're sure to treasure.

Unsigned sheet 38.40 8924



TO ORDER, CALL 1 800 STAMP24

FIRST DAY PROGRAM



(A) FIRST DAY CEREMONY PROGRAM

This handsome ceremony program includes a complete pane of Civil War stamps, with first day cancellations from Gettysburg, PA. Produced in a striking keepsake format and available only in limited quantities, this historic souvenir features reproductions of actual personal letters sent during the Civil War. It also lists the program participants and includes a schedule of the first day activities.

9 95 8832

POSTAL CARD SET



(B) POSTAL CARD SET

From Abraham Lincoln to Jefferson Davis... Ulysses S. Grant to Robert E. Lee... Clara Barton to Mary Chesnut... each of these 20 postal cards beautifully captures one of the meticulously rendered images from our Civil War stamp pane. The people and battles are brought to life in the dramatically enlarged size. As an addition to your collection or for your personal use, they're important mementos of the Civil War years. Includes 20¢ postage on the address side of each postal card.

Set of 20 postal cards	7.95	8833*
With first day cancellations	9.95	8833*

CIVIL WAR MINT SET



(C) CIVIL WAR MINT SET

The stamps tell only a tiny part of the epic story. Packaged with two full Civil War stamp panes, this informative hardbound *Civil War* volume gives the background behind each of the 20 stamp designs. In 96 revealing pages, you'll relive the battles of "Stonewall" Jackson, learn how abolitionist Harriet Tubman led 200 slaves to freedom, and hear the stories of Stand Watie, Admiral Farragut, Winfield Hancock and others. Like our previous *Legends of the West* volume, this beautiful book is filled with researched details and dozens of photographs and illustrations. Includes a special introduction by James McPherson.

29 95 8830

UNCUT SHEET



(D) UNCUT SHEET

The beauty of our Civil War stamps can be appreciated many times over with our limited edition uncut press sheet. This collectible is made up of six complete stamp panes, perforated but not separated. Only 20,000 copies signed and individually numbered by stamp artist Mark Hess, are being made available while supplies last. These uncut sheets are delivered in a protective mailing tube.

(Limit 5 per customer)	125.00	8831
Unsigned version	38.40	8834

(E) STAMP PANE

Issued 6/29/95 at Gettysburg PA

20 designs, gravure (SVS)

Pane of 20, plate no. in 1 corner, 6 positions

This beautiful pane of Civil War stamps highlights 16 famous figures and four historic battles.

Pane of 20 w/plate no	6 40	5524
Pane of 20 signed by artist	29 95	8836

*Available while supplies last

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
NEEDHAM TO INTERROGATORIES OF DAVID B. POPKIN

DBP/USPS-T8-31 I am confused by your response to DBP/USPS-T8-11. [a] How can it be generally yes and yet you know of no particular instances? Explain. [b] If an Express Mail article and a Special Delivery article arrive at an area mail processing center [responsible for delivery to the local post office for delivery to the addressee] at the same time, are there any instances where the Special Delivery article will be delivered to the addressee earlier than the Express Mail article? Your response must be based on the existing postal regulations and should consider any instances, conditions, days of the week or holidays, types of offices, type of delivery, or location of the addressee, or any other possibilities. [c] Explain and enumerate any yes response including reference to the specific regulations, directives, or memoranda [provide copies if not contained in the DMM or DMMTB]. [d] Same as part [b] above except assume that both articles are available for dispatch from the area mail processing center to the delivery post office at the same time. [e] Same as part [c]. [f] Same as part [b] above except assume that both articles arrive at the delivery office at the same time. [g] Same as part [c]. [h] Your response to DBP/USPS-T8-11[a] makes reference to USPS LR-SSR-137. As requested in my instructions, please provide me with a copy of the library reference.

RESPONSE:

a) Express Mail generally receives a higher level of service than special delivery. I know of no particular instance where special delivery mail would receive a higher level of service than an Express Mail article, especially given the very small volume of special delivery and given that it travels with mail of the same class. As a result, the chance of special delivery receiving better delivery than Express mail is slim.

b-g) See part (a) above.

h) See response to DBP/USPS-T8-16(d).

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
NEEDHAM TO INTERROGATORIES OF DAVID B. POPKIN

DBP/USPS-T8-32 Your response to DBP/USPS-T8-12 makes reference to USPS LR-SSR-137. As requested in my instructions, please provide me with a copy of the library reference.

RESPONSE:

See response to DBP/USPS-T8-16(d).

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
NEEDHAM TO INTERROGATORIES OF DAVID B. POPKIN

DBP/USPS-T8-33 Your response to DBP/USPS-T8-13[a] is not responsive to my interrogatory. I am attempting to preclude an instance such as took place with respect to the printed stamped envelopes and to litigate any proposal such as that as a part of the rate case rather than at a later time. [a] Will all of the rates being proposed in this proceeding and which are ultimately approved by the Commission and adopted by the Board of Governors be available to the public without any surcharge or other costs not approved in these proceedings? [b] If not, advise the details.

RESPONSE:

- a) Yes. There are no surcharges. Shipping and handling charges on PFSC are addressed in PRC Order No. 1088.
- b) N/A

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
NEEDHAM TO INTERROGATORIES OF DAVID B. POPKIN

DBP/USPS-T8-34 In your response to DBP/USPS-T8-5 through 7, you appear to have indicated the referenced rates and increments were chosen arbitrarily and without considering any other alternatives. [a] Confirm that you as well as any other USPS employee or consultant did not consider any other alternative. [b] If not, explain. [c] If so, provide details and specifics. [d] If not, explain how that method of setting rates may be perceived as being reasonable.

RESPONSE:

a-d) Not confirmed. It is not possible for me to determine what the hundreds of thousands of USPS employees may have considered. The increments that were chosen were deemed most appropriate for a reasonable rate design. I explain how these meet the requirements of the Postal Reorganization Act in USPS-T-8.

DECLARATION

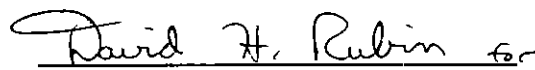
I, Susan W. Needham, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Susan W Needham

Dated: September 19, 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.


Anthony F. Alverno

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
September 19, 1996