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**Inspection Service Area Coordination Audit Report  
on Special Services  
Provided in Response to DFC/USPS-24**

**United  
States  
Postal  
Inspection  
Service**

**Area Coordination Audit**

**SPECIAL SERVICES**

**MAY 18, 1999**

**Case No. 040-1241887-PA(2)**

**U.S. POSTAL INSPECTION SERVICE  
NORTHEAST DIVISION**

**FINAL REPORT**



**RESTRICTED INFORMATION**

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## **INTRODUCTION**

The Special Services audit was selected as a result of the Postal Inspection Service's Fiscal Year 1998 Risk Assessment Process called IMAGE 2000. IMAGE 2000 is a process that risks several hundred audit topics by rating the possible risk numerically. Special Services was ranked high in this process. Special Services are an added value to the customer for convenience and peace of mind when sending mailings which require specific handling. This topic was further reviewed to determine which of the 23 Special Services were at greatest risk. The Special Services items selected for review were as follows; certified mail, registered mail, insured mail and post office boxes. The Special Services, return receipt and restricted delivery, are ancillary services associated with certified mail, registered mail, and insured mail and were included as part of our review.

## **OBJECTIVES**

The primary objectives of the audit were to:

Determine the effectiveness of marketing the sales of certified mail, insured mail, registered mail, return receipt, restricted delivery and post office box services.

Determine if policies are followed for the proper processing and handling of certified mail, insured mail, registered mail, return receipt, restricted delivery and post office box services.

Determine if Special Services training was adequate for window clerks and window unit supervisors and if the supervisors had goal congruence for marketing the aforementioned Special Services.

## **SCOPE AND METHODOLOGY**

This audit fieldwork was conducted between June 1998 and September 1998 by a task force of Postal Inspectors from the Northeast Division in accordance with Generally Accepted Government Auditing Standards. Subsequently numerous exit conferences were held with District and Area managers to discuss the findings in this report.

The scope of the audit was to review certified mail, registered mail, insured mail and post office boxes in the Northeast Area. Prior to our fieldwork, questionnaires were sent to the Northeast Area District Offices and all Plant Managers. Interviews were conducted at the Headquarters, Area and District levels. Fieldwork was performed in each of the nine Districts, ten Processing and Distribution Centers, (P&DC) 107 retail units and two Hub and Spoke Project (HASP) facilities.

As part of the fieldwork, we attempted to test the employee's knowledge of special services by offering mailings which should receive certified, registered or insured service. Stations, branches and associate offices were selected for our test sites.

Sites visited were telephonically contacted to determine the availability of post office boxes. Training programs provided to window clerks and window unit supervisors were analyzed to determine if they adequately addressed the retail sales methods for the customer's needs. Handling procedures for registered mail were observed in Registry Sections and on the platform areas of P&DC's, and HASP'S. Attention was given to locations where customers receive large volumes of certified mail.

## **BACKGROUND**

Special Services are miscellaneous mail services offered to the public for a fee. They include but are not limited to: registered mail, certified mail, insured mail, certificate of mailing, return receipt, restricted delivery, and post office boxes. In the Postal Service, these services are offered by retail employees known as window clerks.

Unlike other sales organizations, the Postal Service does not use sales ability as the dominant criteria for selecting window clerks. Under the current personnel services process, window clerks are assigned their jobs through a bid process. The position is posted for bid and is granted to the senior qualified bidder. Window clerks perform a variety of services for postal customers such as selling stamps and stamped paper; accepting and delivering insured, certified and registered mail as well as providing information to the public concerning postal regulations.

## **VALUE-SELL / CROSS-SELL**

Value-Sell/Cross-Sell is a sales technique whereby the retail employee proactively offers services to the customer instead of leaving it to the customer to initiate the request for services. USPS Headquarters' Retail and Business Managers are responsible for the marketing, sales and services associated with postal products. Discussions with these managers indicated there is a potential for increasing walk-in revenue if retail employees effectively market postal services during their transactions.

According to Headquarters retail management, a form of Value-Sell/Cross-Sell training was given to all window clerks nationwide prior to the period of our audit. This training included instruction in increasing revenue, identifying the customer needs and ensuring customer satisfaction. Critical to the success of the Postal Service is the clerk's ability to react to the customer needs in a retail setting. By asking a few simple questions, the clerk can recommend the services that best meet these customer needs. The four simple questions are:

1. When does it (the mail piece) need to get there?
2. Do you need proof of mailing or delivery?
3. Do you need it (the mail piece) insured?
4. Would you like to put that on your credit card?

The Postal Service implemented the greet, inquire, suggest, thank (GIST) system of quality retail service. The program was devised to improve the Postal Service's image and increase postal revenue. Revenue was to be increased by value-selling and providing customers with the very best service available while consistently greeting customers and thanking them for their business.

The "Ease of Use" and "Mystery Shopper Program" are management tools to measure customer transactions. The measurements indicate if the Postal Service is providing products and services to customers that are simple, convenient, understandable and accessible. The "Mystery Shopper Program" is conducted by an independent outside contractor. The window clerk has no knowledge of the identity of the mystery shopper. The mystery shopper measures the clerk's cross-selling/value-sell technique.

The Field Operations Pilot is a new program developed in the Midwest and Southwest Areas. This program separates delivery and retail operations into two separate units within a post office. The retail unit supervisor reports directly to staff at the district level rather than the facility's postmaster or manager. The pilot is supposed to streamline and update retail operating procedures to allow the employee to better serve the customer. It will also address ways to better evaluate, recognize and encourage superior customer service (Postal Bulletin 21980, September 10, 1998).

#### REGISTERED MAIL

The Domestic Mail Manual (DMM), Section S911.11 states that the registered mail system provides added protection for valuable and important mail and is the most secure service the Postal Service offers because it incorporates a system of receipts to monitor the mail's movement from the point of acceptance to delivery.

Postal customers may select registered mail when mailing a First Class mail piece. Indemnity is provided by the Postal Service against loss, damage or rifling up to a value of \$25,000. Postal customers anticipate and U. S. Postal regulations support, a higher level of security for registered mail. With this expectation, many customers choose to mail high value items via registered mail.

Prior Postal Inspection Service investigations and audits have determined the customer is often confused between the definitions of registered, certified and insured mail. As a result, they do not always select the appropriate service for their needs.

Handbook DM 901, Registered Mail, dated September 1997, details the procedures and regulations for handling domestic registered mail from the point of acceptance to the point of delivery. The processing of registered mail requires individual responsibility at all times. Discussion with the Northeast Division Postal Inspectors revealed that post offices were not providing the required level of security required by Postal regulations for registered mail. The Northeast Area has not fully developed the Registered Mail Improvement Program (RMIP). The basic concept of the RMIP is to require Highway

Contract Route (HCR) drivers to sign for registered mail; therefore maintaining accountability of registered items while in transit (DM-901.43).

## **CERTIFIED MAIL**

Certified mail service provides the sender with a mailing receipt. No record of certified mail is kept at the office of mailing. A delivery record is retained at the destination post office. Certified mail is dispatched and handled in transit as ordinary first-class mail. The applicable certified mail fee is charged in addition to the postage. Certified mail may be combined with return receipt service (PS Form 3811) and restricted delivery service, subject to the applicable standards and fees (DMM.S912.1).

"Return receipt service provides a mailer with evidence of delivery. Return receipts may be requested before or after mailing." (DMM, S915.1.1)

"Restricted delivery service permits a mailer to direct delivery only to the addressee or addressee's authorized agent. The addressee must be an individual (or natural person) specified by name." (DMM, S916.1.1)

The key aspect of certified mail are its delivery features. Certified mail is separated from other first class mail and is treated as an accountable item. This procedure ensures the delivering employees acquire the necessary signed receipts for this mail. Certified mail delivery falls into two general categories: delivery of individual certified pieces to the addressee; and delivery of voluminous certified pieces to the addressee. Postal regulations indicate that a signature is required from the addressee or the addressee's agent before that certified piece is released.

Addressees receiving voluminous amounts of certified mail may find it difficult to sign for this mail at the time of delivery. A hand stamp approved by the postmaster may be used on PS Form 3811 to provide the signature and name of the individual or organization receiving the mail piece. To obtain approval for such a stamp, the company must submit a written statement to the postmaster that the person whose name appears on the stamp is the person authorized to accept accountable mail, accompanied by a sample of the authorized employee's signature that can be verified against the one on the stamp. (On mail addressed to a federal or state official, only the name and location of the accepting organization needs to be shown on the stamp. After approval, the stamped signature and name are acceptable only if a clean legible impression is provided (DMM042.1.7g)

Interviews with Headquarters' management disclosed several concerns. First, certified mail may not be detected in Delivery Point Sequence (DPS) automation. This control weakness eliminates the certified piece as an accountable item. This condition increases the risk that postal employees may deliver these letters without the required signatures and postal documentation. Headquarters management also indicated a concern as to whether certified mail was being properly delivered to larger volume receivers such as the Internal Revenue Service, where the large volumes of mail

created unusual control and documentation problems. Both of these Headquarters concerns focused on the issue of the mailing customer paying for a service that the USPS may not be fulfilling.

## **INSURED**

Insured mail provides up to \$5000 indemnity coverage for a lost, rifled or damage article, subject to the standards for the service and payment of the applicable fee. No record of insured mail is kept at the office of mailing. Insured mail service provides the sender with a mailing receipt. For mail insured for more than \$50, a delivery record is kept at the destination post office. Insured mail is dispatched and handled in transit as ordinary mail. A parcel insured for \$50 or less is delivered as ordinary mail (DMMS913). Insured parcels over \$50 are subject to the delivery conditions for accountable mail set forth in the Domestic Mail Manual, Section D0421.7.

## **DELIVERY CONFIRMATION**

With the onset of Delivery Confirmation, the Postal Service will offer another value-added service to the customer. Postal delivery personnel will scan barcoded accountable mail when delivery is made. Data on "time and date of delivery" will then be stored in the scanner's memory to be later downloaded on postal host systems. The data from the scanner will enable customers to verify the delivery status of certified, registered and insured mail among other postal products and act as another form of return receipt service. In addition, the delivery confirmation system will help the Postal Service measure and improve service performance.

## **POST OFFICE BOXES**

Post office box service is a premium service offered for a fee to any customer requiring more than free carrier delivery or general delivery and for no fee to certain customers who are not eligible for carrier delivery. The service allows a customer to obtain mail during the hours the post office box lobby is open.



## **CONCLUSION**

Northeast Area officials are aware of the importance of effectively offering and rendering Special Services to the public. Retail marketing programs such as the "Mystery Shopper Program", and "Retail Labs" were being used as tools to measure the effectiveness of retail operations. However, a more detailed focus needs to be directed to the day-to-day operations in retail units to insure employees are proactively offering these Special Services. Additionally, more attention needs to be devoted to the rendering of Specific Special Services such as registered mail and certified mail to insure compliance with postal regulations and customer satisfaction.

Increased training and better marketing skills of Special Services will greatly increase walk-in revenue. Special Services such as registered mail, insured mail, certified mail, return receipt and restricted delivery could have been more profitable if a specific Northeast Area marketing initiative had been established targeting these services. To increase performance in this area, Headquarters has set a goal to double revenue of Special Services to \$3 billion by Fiscal Year 2001. The Northeast Area can help to fulfill this goal and improve service through training and employee recognition programs, through better monitoring of retail operations, and by working with Headquarters on new recruitment and job classification initiatives which have a retail operations focus. More attention to fitting the customer's need to the correct Special Service will produce a satisfied customer while increasing postal revenue. In our Value-Sell/Cross-Sell Finding, we offered recommendations to improve internal controls. Management agreed with these recommendations and provided their action plans for implementation.

Security provided registered mail was not adequate to prevent loss. Individual accountability was not maintained during each stage of dispatch and transit. Registered mail was not properly handled using systems and procedures in compliance with established regulations. Supervision of employee activities was infrequent. Periodic reviews and attention to current regulations will ensure the USPS is providing the level of service postal customers expect. In our Registered Mail Finding, Management generally agreed with most of our recommendations to improve internal controls. Management's Response and our Inspector Comments discuss the need for tightening internal controls on Highway Contract trips and in Processing and Distribution Centers.

Special attention given to the delivery of certified mail is required due to the increased problems associated with delivering large volumes of accountable mail. Better controls are needed to ensure these deliveries are properly processed and documented on PS Forms 3849, Delivery Notification/Reminder/Receipt, PS Forms 3883, Firm Delivery Receipts, or facsimiles, and PS Forms 3811, Domestic Return Receipt. By controlling PS Form 3811 instead of relinquishing responsibility for its processing to the recipient, the USPS can reduce the number of inquiries made by the customer and reduce the time in investigating the delivery of these certified mail pieces. In our Certified Mail Finding, Management acknowledged that improvements needed to be made in this area but referred the matter to National Headquarters. In our Inspector Comments, we discuss the need for more Area attention to these issues.

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Certified mail was commingled with Delivery Point Sequence (DPS) mail because the certified mail detector was either non-existent or not programmed on the Delivery Bar Code Sorter (DBCS) and Carrier Sequenced Bar Code Sorter (CSBCS) machines. As a result, there was a possibility the certified letters in trays of DPS mail would be overlooked by the delivery employee and delivered to the recipient without obtaining a signature. Management must ensure that automation equipment is properly processing this mail and, when it is not, supplement the processing with human verifications.

Our review determined there were no significant deficiencies in the delivery procedures associated with insured mail. Our review also determined post office boxes were available at postal facilities in the Northeast Area.

## **DETAILED FINDINGS AND RECOMMENDATIONS**

### **VALUE-SELL / CROSS-SELL**

#### **FINDING**

Northeast Area employee commitment to "value-selling / cross-selling" of Special Services needed improvement to capitalize on each opportunity to contribute to Voice of the Business (to generate additional postal revenue) and Voice of the Customer (to increase customer satisfaction). Special Services such as registered mail, certified mail, insured mail, return receipt requested and restricted delivery were not actively offered to customers by retail employees unless specifically requested by the customer. Education is one of the key tools toward servicing the postal customer's needs. Insufficient retail training courses and non-creative incentive programs have lead to the demise of increased revenue generation. Hiring the senior qualified window clerk rather than the best qualified window clerk inhibits the potential for further revenue growth.

Window clerks were not always offering certified, registered, and insured services for mailings that were presented by postal customers. During our review, 262 "ordinary mailings were presented to clerks at 107 post offices/stations/branches to determine whether the "value-selling / cross-selling" of Special Services would be offered. As part of our audit, the customers (Inspectors unknown to the window clerks) made "prompted" and "unprompted" mailings. In a "prompted" mailing, the Inspector, volunteered pertinent information about the mail piece that should have prompted the clerk to offer special services. In an "unprompted" mailing, no information concerning the mail piece was volunteered unless requested from the window clerk. In total, we made 131 "prompted" mailings. In 90.8% (119) of these mailings Special Services were offered to us by the retail employee. There were 132 "unprompted" mailings. Out of these mailings, 24.2% (32) received the proper treatment. Overall, in the "unprompted" mailings, when certified, insured or registered services were desired, 75.8% of these mailings were processed as ordinary first class mailings. Details, by site, of "value-selling / cross-selling" attempts are included as Exhibit 1.

The non-offering by window clerks of Special Services can adversely impact customer satisfaction and reduce the postal revenue that is generated at the customer retail service counter. Knowledge of Special Services such as registered, insured and certified mail and the different features of each service are vital to the customer. It is the responsibility of the window clerk to help identify the correct service and alleviate the customer's confusion between available services. Without the "value-sell / cross-sell" of Special Services, the potential for customer loss of valuable items, which could have been insured or registered, is increased. Similarly, mailings for which the customer could benefit from knowledge of a delivery receipt, or proof of mailing would not be realized.

Review of the Northeast Area training for window clerks determined that formalized training was minimally received. On-the-job training was the prevalent method to increase the retail employee's knowledge of "value-selling / cross-selling" skills.

Management at the retail unit level had not received defined goals and expectations relating to the "value-selling" of Special Services. As such, there was minimal incentive for window clerks to afford any effort toward the "value-selling" of Special Services.

National Retail Operations has identified the need for a focused retail management effort designed to improve customer satisfaction, maximize employee potential and achieve greater retail revenue. Headquarters has established some changes that address the way we serve our customers at our retail locations by creating the Field Retail Operations Pilot. This pilot is currently implemented in the Midwest and Southeast Areas. Postal Bulletin 21980, dated September 10, 1998, page 54-75 gives an overview of the Field Retail Operations Pilot. According to this bulletin, "Focused attention on satisfying the retail customer at the front line will reap the full benefit of our retail network".

## **RECOMMENDATIONS**

We recommend the Vice-President Area Operations, Northeast Area:

- 1.1 Ensure retail employees receive additional "value-selling/cross-selling" training.
- 1.2 Consider creating a pro-active recognition program to reward retail employees who correctly identify the customer's needs and offer suggestions to improve revenue growth.
- 1.3 Consider discussing programs with headquarters regarding hiring retail employees who are best qualified for the position of window clerk rather than senior qualified or consider discussing with headquarters, the possibility of restructuring the job description for window clerks to ensure customer satisfaction.
- 1.4 Ensure District Managers require their management staff to regularly monitor retail employees engaged in retail transactions to ascertain whether appropriate value sell/cross-sell procedures are being practiced.
- 1.5 Ensure an area representative performs periodic visits to oversee District compliance at randomly selected postal retail units and refers back to the local level for corrective action those situations where attempts to "value-sell/cross-sell" Special Services failed to be performed by a retail employee.

## **MANAGEMENT'S RESPONSE**

- 1.1 Eight of nine Performance Clusters in the Northeast Area have completed development of clerk and supervisor/Postmaster training sessions. The Northeast Area will monitor to ensure the training is completed in all Clusters.
- 1.2 As identified by the Mystery Shopper Program, offices scoring 100 percent, including cross-selling techniques, will receive a letter and certificate from the Area Vice President. Each Performance Cluster will hold a recognition ceremony in these offices using their "Good News People" to publicize the positive results.
- 1.3 The Northeast Area will continue to support Headquarters' efforts to complete their ongoing work with the APWU to change retail clerk job descriptions and titles and levels to focus on sales skills and product knowledge. We highly support this recommendation and are optimistic this will be rolled out before the end of FY'99.
- 1.4 Results of the Value Sell audits have been presented, this January, to the District Managers, Plant Managers, Northeast Area Office Executives and representative Managers, Post Office Operations, and Managers, Operations Program Support from the Performance Clusters. The Performance Clusters will be required to address their actions on this topic at Quarterly Business reviews throughout FY'99.
- 1.5 Northeast Area Retail staff will conduct full retail audits four times per year in each Performance Cluster. Reviews will focus on revenue generation opportunities, Post Office visits and meeting with Managers, Post Office Operations. Results will be sent to District Managers in writing with a follow up and visit 30-45 days following the review. The first two audits are scheduled for the week of January.

## **REGISTERED MAIL**

### **FINDING:**

Registered mail security needs to be improved throughout the Northeast Area. Registered mail on Highway Contract Routes (HCR), on the Processing & Distribution Center (P&DC) platforms and workroom floors, and at the Hub & Spoke Project (HASP) facilities needed better individual accountability.

Postal Management at all levels needs to increase its focus on registered mail transiting between registry sections to increase the concept of individual accountability in accordance with current postal instructions. The responsible clerks, mailhandlers, and HCR drivers need to be trained in the most current postal regulations to ensure registered mail is properly handled. The failure to handle registered mail in a manner that allows for the fixing of individual responsibility at all times subjects the Postal Service to unnecessary risk of loss from theft and deprives its customers of a premium service for which they have paid.

### **DETAILS OF FINDING:**

#### **Highway Contract Route (HCR) Drivers**

Better controls were needed to document the transfer of registered mail via HCR drivers between facilities. HCR drivers in all P&DC's visited were not signing for registered mail nor being cleared at the destination for delivered registered mail. Registered mail must be handled so that individual responsibility can be assigned at all times, consistent with Handbook DM-901. Section 431 of Handbook DM-901 states:

"When registered mail is dispatched by HCR, postmasters must prepare PS Form 3854 using a separate manifold, dedicated to tracking HCR accountability. This form should be in triplicate, notated with the dispatch seal, rotary lock, and/or outside registered numbers." It further states, "the HCR operator must sign, date, and enter the time of receipt of the registered mail dispatch on all copies of PS Form 3854. The HCR operator leaves the second copy of Form PS 3854 and takes the original and remaining copies with the registered mail. At the main office or next mail transfer point, the employee designated to receive registered mail on the platform assumes responsibility for the dispatch by signing all copies of PS Form 3854. The HCR driver keeps one copy, and the original is filed by the employee."

"When an HCR operator transfers registered mail dispatched from a post office to another HCR operator at a transfer point where postal employees are not on duty, the second HCR operator signs and receives copies of

PS Form 3854 and continues after verifying the lock or seal number or outside registered mail."

HCR operators who drive from the HASP to a designated point of transfer outside the post office (i.e. rendezvous points such as hotel and restaurant parking lots) are not cleared by the relief HCR driver who continues that transfer to another HASP. The relief driver, in turn, is not assuming responsibility for the registered mail with his/her signature.

#### **Handling of Registered Mail at Processing and Distribution Centers (P&DC's)**

Our review of registered mail handling at various P&DC's in the Northeast area disclosed in-plant individual accountability was not in compliance with postal policy and procedure. We determined that registered mail transported to registry sections from incoming vehicles and from registry sections to outgoing vehicles was not properly controlled in accordance with postal regulations. Documentation of the in-plant transfer of registered mail was lacking at eight out of the nine P&DC's reviewed. No consistently controlled, documented system existed to establish the individuals who transported this mail from the registry section to the HCR driver or from the HCR driver to the registry section. Mailhandlers, expeditors and elevator operators had control of the registered items without signing. At some facilities, mailhandlers brought the registered items to the registry unit. At other facilities, the registry clerk would repeatedly visit the platform and workroom floor to collect the unattended registered items. Inadequate supervision and lack of a registry coordinator at many of these sites have contributed to mismanagement of registered mail.

Dispatching registered mail calls for a registry clerk to accompany all registered mail to the loading platform and remain on the platform until loading is completed and all vehicle doors are locked. Section 572.2 of the Handbook DM-901 states, "when management deems it advisable, the employee may deliver the pouches to a designated employee on the platform after identifying the dispatches to be made. The registry employee must obtain the signature of the employee taking custody of the dispatch."

Management of registry sections could be improved. Sporadic supervision has led to inadequate oversight of an operation moving large monetary instruments and irreplaceable items via registered mail daily. Although the nine P&DC registry sections we reviewed were high risk areas, only the largest one (Boston) had a full-time supervisor whose lone responsibility was registered mail. In the remaining eight P&DC's, supervision of the registry section was a collateral duty which received minimal attention. As a result, registry activities were not adequately surveyed to ensure operations provided the expected level of service to postal customers. These expectations included continuous individual accountability and security of the mail, as it was transported to and from the registry sections.



The Northeast Area's largest P&DC registry section located in Boston, handled items totaling approximately \$45,000,000 per week. This Registry Section had only one permanent supervisor assigned to govern that unit. Tours one and two had no dedicated supervisors; only 204-B's or detailed assignments. Lack of staffing and experienced supervision has led to considerable volumes of delayed registered mail. The size of this facility and the location of the registry section pose security problems which must be addressed by increased management attention. Large concentrations of registered mail were being moved lengthy distances throughout the two building complex between vehicle loading areas, a detached registry room, and the registry section by mailhandlers, jitney drivers, and elevator operators who were not signing for the mail. The one full time registry supervisor we interviewed indicated there was a need for transfer clerks to establish individual accountability between the registry section and the loading platform.

### **Hub and Spoke Project (HASP)**

Observations conducted at the Northern HASP and Binghampton HASP revealed hand to hand exchange was not conducted for registered pouches and high value mail. The HASP's had no registry sections and registered mail was left unattended among the employees and HCR drivers. Most of the employees were casual or transitional appointments. *There was no documented transfer of the registered mail from one driver to another.* Our observations at the Northern HASP revealed registered pouches were placed on the bollards located at each bay. There was no perimeter security for the HASP. Any individual could approach the HASP loading platform and easily grab these pouches unnoticed. Failure to adequately control registered mail at the HASPs could subject the postal service to loss and decreased customer confidence.

### **RECOMMENDATIONS**

We recommend the Vice-President Area Operations, Northeast Area:

- 2.1 Issue instructions to all offices in the Northeast Area to achieve accountability when handling registered mail. Provide training and guidance to employees and supervisors to ensure accountability for registered mail is documented and customers receive the service as articulated in the postal regulations.
- 2.2 Ensure a designated area official is made responsible for coordinating and reviewing registry operations throughout the area. Special attention should be given to operations at the HASPs.
- 2.3 Ensure each facility has a knowledgeable registry coordinator who periodically coordinates all registry activities, prepares standard operating procedures,

coordinates security matters with the security control officer, arranges training, and ensures registry procedures are in compliance with current official guidelines.

- 2.4 Ensure employees are designated to be accountable for registered mail in transit to/from registry sections.
- 2.5 Ensure HCR drivers understand their responsibilities relating to registered mail and properly transfer registered mail.

## **MANAGEMENT'S RESPONSE**

- 2.1 Training and guidance, pursuant to the concerns outlined herein, will be developed and implemented as recommended. Prior to the rollout, however, a decision concerning our 90-day test will dictate the subjects and extent to which the training will be made.
- 2.2 Current responsibility for reviewing and coordinating registry operations throughout the Area does not rest with one individual. There is no authorized position to cover this function and to assign it as a collateral ad hoc duty is inadequate. Request will be made to Headquarters for an authorized non-bargaining unit position to assume this responsibility. In the interim, the Area Security Control Officer will coordinate registry activities among the three operations' groups (Distribution Networks, Delivery and In-Plant).
- 2.3-
- 2.4 The Area Security Coordinator will begin the task of ensuring that there is knowledgeable registry coordinator at each facility. This will be handled through the respective security control offices and committees.
- 2.5 Three month test sites discussed herein.

At the present time, Highway Contract Drivers are not required to sign for Registered Mail, precluding the Northeast Area from fully implementing the Registered Mail Improvement Program (RMIP). This requirement has not been promulgated by the Area for two reasons previously cited to Inspection Service representatives by Alexander Lazaroff, Area Manager, Operations Support. Reason one is the concern that the routine aggregation of significant quantities of identifiable Registered Mail at hub offices, where physical security is minimal, will place on-duty Postal personnel and contractors in jeopardy of robbery and attendant dangers. The attention, which will be drawn to the aggregation of this mail at facilities in relative small towns in remote locations with minimal law enforcement presence, is unavoidable. Normal discussions by employees or contractors with coworkers, family members, or friends will compromise the routine, making a criminal attack in such a location a matter of time inevitably.

Coded shipments through such locations are infrequent, irregular, escorted and NOT routine.

The aggregation of Registered Mail at a hub unit could easily cause the total value on an HCR run to exceed that which would be handled as a coded shipment between the hub office and the plant. The routing between the hubs and the respective plants is, in many instances in the Northeast Area, over secondary, dimly lit roads, placing the contract driver in jeopardy.

Although changes in how mail is dispatched has made Registered Mail much easier to locate in the general mailstream, some effort still must be spent to identify such mail from other classes. To successfully identify Registered Mail in the mailstream without the direct assistance or specific information from a knowledgeable Postal employee is unlikely to be accomplished by a lay person. Identifiable Registered Mail aggregated in a specific location, daily, can be picked off by anyone so inclined.

The second concern involves service. The Northeast Area Performance Clusters have made extraordinary progress in advancing collection mail through the 010 operation by 1800. The benefits of these efforts are obvious, and the results are reflected in excellent service scores. The concern is that the inherent delay in signing and rebilling scores of Registered pouches or outsides at hub offices will delay mail arrival at the plants, thereby narrowing already tight windows of operation with a resulting diminution in service. This would not be acceptable.

Mr. Lazaroff and others on my staff have expressed the above concerns to Inspectors Bethel, Mastrangelo, LeCam, Diotte, Mancini and Newton. All of the Inspectors have ensured that at locations throughout the rest of the country where RMIP has been fully implemented and aggregation of Registered Mail is occurring at hub offices, no increase in criminal attacks on Registered Mail has taken place. They see no increase in exposure to attack. I have intuitive concerns about added exposure to robbery.

I would like to test the RMIP in one of the Clusters to ascertain the effect it will have on service; specifically, if it will adversely change the amount of collection mail through the 010 operation by 1800. I would want to determine the implications (value of shipments) of aggregating identified Registered Mail at a hub office and transporting the aggregate from the hub to the plant through normal transportation. Additionally, I need to determine what type of physical security will be required at hub offices while the registers await transportation to the plant.

The test will last three months after which I will contact you with my decision as to whether to roll RMIP Areawide, or with my concerns and issues developed with data from the test site.

Improper handling of Registered Mail at the HASPs was also cited as a finding. I have asked John O'Neill, Manager of Distribution Networks, to perform an analysis of the turnaround time for transportation connections and the volume of Registered Mail entering both HASPs.

Initially, the HASPs were to be cross-dock operations with minimal time between respective receipts and dispatch (under two hours). The HASPs' operations have evolved into something more than cross-dock facilities; therefore, more data is needed to ensure the right decisions are made.

A determination as to whether HASP registry sections are needed will be made within 90 days, and I will so advise you.

## **INSPECTOR COMMENTS**

- 2.5 In its response, Northeast Area postal management raised concerns that requiring HCR drivers to sign for Registered Mail under the Registered Mail Improvement Program (RMIP) would cause the mail to be aggregated. Management indicated this aggregation would draw more attention to the Registered Mail thereby causing susceptibility to attack as HCR drivers and postal employees become more aware of the special nature of this mail. All research done on this matter both inside and outside the Northeast Area indicates HCR drivers are well aware of the special nature of the Registered mail pouches. The accountability of the HCR drivers serves as a more effective deterrent to theft. The new procedures would not cause any more mail to be carried on vehicles than is currently transported.

On October 16, 1996, Mr. Allen Kane, Vice President, Operations Support, and Kenneth J. Hunter, Chief Postal Inspector, co-signed a letter indicating these new RMIP procedures would be implemented nationwide. Subsequent RMIP meetings between Area officials and Postal Inspectors assigned to the Internal Crimes Team have indicated the Area's hesitation to implement the program. Implementation and continued adherence to the RMIP have proven to be beneficial to the Postal Service. Registered Mail losses investigated by the Inspection Service dropped from \$4 million in FY 96 to \$2.9 million in FY 97 in Areas that had implemented the RMIP. Without the Northeast Area HCR drivers' participation, the only place Registered Mail will be afforded individual accountability in a Processing and Distribution Center is inside the registry cages where the risk of loss is lowest.

Registered Mail is not handled in the Northeast Area commensurate with the fees paid by customers for the added security and individual accountability. By not adhering to the RMIP, the Northeast Area is providing a lower level of Registered Mail service to its customers than other Areas implementing this program. In the Northeast Area, Registered Mail is receiving only regular First-Class Mail service between the point of entry and signature at the destinating office. In addition to

HCR drivers not signing for Registered Mail, this mail was not properly handled on platforms and workroom floors to ensure accountability. There are numerous Postal Service regulations, which, if followed, would eliminate Registered mail being left unattended in postal facilities.

On April 5, 1999, the RMIP was implemented utilizing the Pittsfield Post Office as a test site. Subsequent discussions with postal management indicated the transition has been trouble-free. To date, no documented response has been received from the Northeast Area office indicating a commitment to involve all districts in the Process.

On April 8, 1999, the area responded to this office with an update on Registered Mail transported through the HASP. It is the intention of the NEA DNO to route Registered Mail away from the HASPs rather than establish Registered Mail operations at the Binghamton and Northern HASPS. The Area will begin to do this plant by plant commencing within a few weeks and expects full accomplishment within 6-8 weeks.

## **CERTIFIED MAIL**

### **FINDING**

Better internal controls were needed at Northeast Area Postal facilities delivering large volumes of certified mail to individual businesses and government agencies. Customers were paying the service fees for the handling and documentation associated with the delivery of certified mail. However, at the point of delivery, Postal personnel were not adequately controlling certified mail to ensure postal delivery records were properly documented and service was rendered to the mailing customers. As a result the customer was not receiving the service as advertised by the Postal Service.

Certified mail service increased during peak federal and state tax reporting periods. We found the Postal Service did not fully utilize its resources, commensurate with the increased revenue, to accommodate the increased volume of certified mail and properly control its delivery. PS Forms 3811, Return Receipts, were not always returned to the mailer. Due to the inadequate delivery procedures, the Postal Service was unable to determine which party was responsible for the non-conveyance.

Customers were inconvenienced because they were required to file PS Forms 3811-A, Duplicate Return Receipt, and wait additional periods of time to determine if certified pieces addressed to these large volume receivers were delivered. Consumer affairs and claims/inquiry offices had to use excessive work hours investigating the delivery of certified mail pieces.

In response to an Inspection Service questionnaire sent to all District Managers and Senior Plant Managers, three District offices and five plants identified certified mail as an ongoing problem in their facilities. Their main concern was callers with direct holdouts were receiving certified letters in their mail. Additionally, customers were receiving certified letters without signing for receipt of the item. According to our survey, plant managers were concerned that certified mail was bypassing the facility and going directly to the federal and state agencies without being documented.

### **DETAILS OF FINDING**

Based on the results of the above questionnaire, we sampled at least one large volume certified mail receiver in each of the 9 districts.

- A. We found two districts (Boston and Middlesex/Central) had undocumented deliveries.
- B. We found six districts (Albany, Boston, Middlesex/Central, New Hampshire, Providence, and Springfield) where postal employees were not obtaining signatures on the return receipts, PS Forms 3811. This non-service resulted in the customer

being overcharged by \$.90 (\$1.10 - \$.20, postcard fee) for non-completion/non-control of PS Form 3811.

- C. We found three districts (Boston, Albany and Middlesex/Central) where postal facilities processing in excess of a postcon of mail per day had not made arrangements with the addressee to deliver this mail at a mutually agreeable transfer site where these huge volumes could be expeditiously delivered while being simultaneously controlled and documented.
- D. We found three districts (Albany, Boston and Middlesex/Central) where more resources were needed to ensure certified mail would be delivered in a timely fashion.
- E. We found all nine districts where automation equipment was not effectively programmed to separate the certified mail, increasing the possibility of an undocumented delivery to the addressee.

#### Middlesex / Central District

The Internal Revenue Service (IRS) located in Andover, Massachusetts receives approximately 200,000 pieces of certified mail daily during peak tax periods; April and quarterly filings. The mail is processed at the Middlesex/Essex Processing and Distribution Center in North Reading, MA. The Computerized Forwarding Unit (CFS) handles the preparation of IRS mail for delivery. We observed certified mail being scanned which generated a computerized manifest thereby creating the delivery notification receipt. The pieces scanned were placed back into trays, loaded into postal equipment and shipped to the IRS facility in Andover. Mail averaged two to three days to be processed through this unit. This mail was not reported as delayed on the Daily Mail Condition Report. Once delivered, no IRS employee was signing the manifest acknowledging receipt of the mail.

According to postal employees, most of the certified letters mailed to the IRS had PS Forms 3811 attached. It was the practice of the Middlesex/Essex employees to remove PS Forms 3811 from the envelopes after scanning, and then hand stamp them to show the date of delivery. We found the manifest and PS Forms 3811 did not accompany this mail to the IRS office but instead were delivered at a later time. The PS Forms 3811 were surrendered to the IRS. The IRS would assume custody of PS Forms 3811, endorse the forms, and return them to the Postal Service when they found time available. The Postal Service had no system in place to ensure all PS Forms 3811 rendered to the IRS were returned. We found an antiquated computer system made it difficult and time consuming to research the many claims which were received by the District's Consumer Affairs Office.

#### Albany, NY District

Similar conditions existed with mail delivered to the State of New York Department of Taxation. The processing for delivery was handled at the Albany, NY P&DC. The Department of Taxation employees were signing the manifest upon delivery of the mail with PS Forms 3811 still attached to the certified letters and flats. Postal Service employees did not remove PS Forms 3811 from the items to obtain the signature or hand stamp as required. These forms (when signed or hand stamped) were returned to the Postal Service when it was convenient for the Dept. of Taxation. The Postal Service failed to ensure the PS Forms 3811 were signed by the addressee and returned to the sender through the mails.

Limited Postal resources were used to process this mail during peak tax filing periods. As with the IRS certified mail, not all mail was delivered the same day as it was processed to the Department of Taxation. The undelivered mail was not being reported as delayed mail on the Daily Mail Condition Reports.

#### Providence District

Letter carriers at the Providence, RI Post Office were delivering between 500 and 1000 pieces of certified mail to the Rhode Island Division of Taxation (RIDT). Control of the certified mail at the time of delivery needed to be improved. Prior to assigning the RIDT mail to delivery employees, station clerks were scanning the numbers on the certified letters to create a computerized PS Form 3883A, Firm Delivery Receipt. These PS Forms 3883A were stamped with a post office date round iron. The indicia should have been affixed after delivery. Many carriers were delivering certified letters with the PS Forms 3811 attached along with PS Form 3883A, Firm Delivery Receipt. Signatures were obtained at a later time.

#### Boston District

The Incoming Mail Center (IMC) located in Chelsea, MA was delivering one postcon of certified mail daily to the Commonwealth of Massachusetts Department of Revenue (DOR). Scanning the certified numbers into a computer created the manifest. This manifest was not used as a delivery document. No representative of the DOR signed for the daily shipments of certified mail. Forms PS 3811 were left attached to the mail and delivered to the DOR. Neither postal management nor craft employees interviewed were able to describe how PS Forms 3811 were endorsed by DOR and returned to the Postal Service.

#### New Hampshire District

During peak periods the Concord, New Hampshire Post Office delivered between 3000 and 8000 pieces of certified mail to the State of New Hampshire Revenue Administration Office. The mail was delivered as a caller service from the Concord Post Office. Delivery of the mail was documented by the agent of the addressee signing a computerized manifest listing the certified numbers. According to Postal employees,



approximately 40% of the certified pieces had PS Forms 3811 attached. These forms were removed from the mail and given to the agent for signature processing at the Revenue Administration Office. The forms were subsequently brought back to the Post Office by the agent for return to the mailer.

#### **Springfield District**

Mass Mutual Insurance Company in Springfield, MA was receiving as many as 120 pieces of certified mail daily at the Springfield P&DC. Postal employees listed the certified letters on PS Form 3883. Representatives of Mass Mutual accepted the mail and signed PS Form 3883. The Postal employees were leaving the PS Form 3811's attached to the certified letters at the time of delivery. By their actions, local postal officials had made it the responsibility of Mass Mutual to ensure the forms were signed and returned to the mailer through the mails.

The Domestic Mail Manual Section D042.1.7 states that for all accountable mail (including certified mail):

- a. The recipient (addressee or addressee's representative) may obtain the sender's name and address and may look at the mail piece while held by the USPS employee before accepting delivery and endorsing the delivery receipt.
- b. The mail piece may not be opened or given to the recipient before the recipient signs and legibly prints his or her name on the delivery receipt (and return receipt, if applicable) and returns the receipt(s) to the USPS employee.

#### **RECOMMENDATIONS**

We recommend the Vice President Area Operations, Northeast Area:

- 3.1 Ensure Postal employees handle certified mail in accordance postal regulations.
- 3.2 Ensure the necessary upgrades are accomplished in the computerization of the delivery receipts for firms that receive large volumes of certified mail.
- 3.3 Ensure the operations responsible for the controlled delivery of this mail and documentation of delivery are adequately staffed.
- 3.4 Ensure the mail being processed for these large volume customers is managed, using the USPS color code system, and the conditions of this mail are reported daily as part of the Daily Mail Condition Report.
- 3.5 Ensure suitable transfer sites are developed to logistically handle the controlled delivery of certified mail from the Postal Service to the large volume customers.

- 3.6 Ensure certified mail detectors are operational or adequate staffing is utilized to cull accountable mail from ordinary first class mail.

## **MANAGEMENT'S RESPONSE**

3.1-

- 3.6 As stated in the initial response from William Bothwell, Manager of Delivery Programs Support, the issues uncovered in the audit concerning large volume recipients/addressees are national issues.

After Inspectors Mancini and Newton brought their findings to our attention, we contacted Sandra Curran, manager of Delivery Policies and Programs, concerning the national implication of the findings. She assisted in scheduling a meeting at national Headquarters concerning the issues on January 7, 1999. The meeting was held on that date with representatives from Delivery, In-Plant, Engineering, Special Services, Marketing and the Inspection Service.

The problems outlined in the findings were discussed and it was agreed that the issues uncovered in the Northeast Area audit were general in nature and indicative of systemic problems. John Dorsey, Manager of Special Services, Don Leonard, Delivery Policies and Programs, and Jim Buie, Engineering, are addressing the issues discussed with the purpose of designing systems and procedures to enable the Postal Service to comply with existing requirements while improving automated handling of the large volume of Certified Mail.

This entire matter is being viewed from a national perspective. Additionally, I have tasked the District Manager of Middlesex-Central with improving the manner in which Certified Mail is tendered to the IRS in Andover, MA, and bringing the handling into closer compliance with established procedures. Headquarters will keep the Northeast Area updated on procedural changes as they are developed. Currently, we feel that the findings are appropriately addressed by the Headquarters' group.

## **MANAGEMENT'S SUPPLEMENTAL RESPONSE**

(On April 8, 1999, the following supplemental response was received from Gregory Petrin, Northeast Area Operations Program Analyst.)

Steve Rossetti has been working with the IRS to reduce or eliminate the amount of accountable mail mixed with regular mail by using casuals to do a 100% verification of the "non-accountable" mail that is destined for the IRS. The goal would be to assure that the only certified mail the IRS receives will be processed through the CFS unit. This would apply only to mail that goes through the platform operation at Middlesex. A casual is also on duty at the IRS to assist in removing the Certified mail from the "non-accountable" mail. I have contacted Bill Bothwell at HQ to see

where we stand with a technological solution to the problem. I am expecting an update from him shortly, but it appears that it will take some time to reach a solution to this issue.

## **INSPECTOR COMMENTS**

3.1-

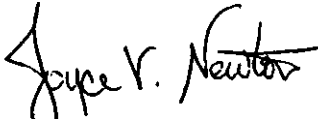
3.6 To date, the only response received from the Northeast Area was related to the Middlesex Central District's handling of certified mail addressed to the IRS in Andover, MA. No response has been received concerning conditions cited in the other Districts.

The Northeast Area has requested assistance from National Headquarters relating to the delivery of Certified Mail to the IRS. No update has been received regarding upgrading the level of service for the tax reporting season. New methodologies developed by Headquarters may be helpful; however, indications are that revenues received from Certified Mail sales are adequate to pay for the resources needed to handle this mail.

## **SPECIAL SERVICES – BEST PRACTICES**

### **DPS Mail**

The Springfield, MA Main Street Station was the only office where the certified mail detectors were operating effectively in the Springfield District. Carriers interviewed indicated they noticed a sharp decrease in the number of certified mail pieces in their DPS mail. Our review revealed personnel had discovered a way for the certified mail detectors to work about a month before this audit began. According to the Quality Improvement Specialist, the work done with the certified mail detectors was a Postal Service retrofit.

  
Joyce V. Newton  
Postal Inspector

VALUE SELL / CROSS SELL ANALYSIS

CERTIFIED

DISTRICT	OFFICE	OF	MAILING	ZIPCODE	TOTAL MAILINGS	TOTAL VALUE	% OF RETURN	QUANTITY	TOTAL MAILINGS	TOTAL VALUE	% OF RETURN	QUANTITY
ALBANY	Saratoga Springs			12866	1	0	0	0				
	Voorheesville			12186	1	0	0	0				
	Stuyvesant Plaza			12203	1	1	100	0				
	Amsterdam			12010	1	1	100	1				
	Binghamton			13902	1	0	0	0				
	Cobleskill			12043								
	Gloversville			12078								
	West Lebanon			12195								
	Slingerlands			12159								
	Ballston Station			12020								
	TOTALS											
					5	2	40	1	5	5	100	5
BOSTON	Needham Heights			02494	1	0	0	0				
	Wellesley Hills			02481	1	0	0	0				
	Porter Square			02140	1	0	0	0				
	East Arlington			02474	1	0	0	0				
	Back Bay Annex			02117	1	0	0	0				
	Roslindale			02131								
	Uphams Corner			02125								
	Dorchester Center			02124								
	Allston			02134								
	Charles St Station			02114								
	TOTALS											
					5	0	0	0	5	5	100	3

VALUE SELL / CROSS SELL ANALYSIS

CERTIFIED

DISTRICT	OFFICE	OF	MAILING	ZIPCODE	TOTAL MAILINGS	UNPROMPTED	SOLD	%	VALUE	QUANTITY	PROMPTED	SOLD	%	VALUE	QUANTITY	OF RETURN	RECEIPTS	SOLD	%	VALUE	QUANTITY	OF RETURN	RECEIPTS
CONNECTICUT	Williamantic	OF	MAILING	06226	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Easthampton	OF	MAILING	06424	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Stratford Postal Store	OF	MAILING	06497	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Simsbury	OF	MAILING	06070	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	West Suffield	OF	MAILING	06093	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Columbia	OF	MAILING	06237	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Middletown	OF	MAILING	06457	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Windsor	OF	MAILING	06096	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Granby	OF	MAILING	06035	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Enfield	OF	MAILING	06082	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	TOTALS																						
	5																						
	0																						
	0																						
MAINE	Kittery	OF	MAILING	03904	1	1	100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	York	OF	MAILING	03909	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Ogunquit	OF	MAILING	03907	1	1	100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	York Beach	OF	MAILING	03910	1	1	100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Cape Nedic	OF	MAILING	03902	1	1	100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Scarborough	OF	MAILING	04074	1	1	100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Portland	OF	MAILING	04101	1	1	100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	South Portland	OF	MAILING	04116	1	1	100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Kennebunkport	OF	MAILING	04046	1	1	100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Wells	OF	MAILING	04090	1	1	100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	TOTALS																						
	5																						
	3																						
	60																						
	0																						
	5																						
	5																						
	100																						
	4																						

VALUE SELL / CROSS SELL ANALYSIS

CERTIFIED

DISTRICT	OFFICE	ZIPCODE	MAILINGS	UNPROMPTED	TOTAL	VALUE	%	QUANTITY	MAILINGS	TOTAL	VALUE	%	QUANTITY
	OF	OF	MAILING	MAILING	VALUE	VALUE	OF RETURN	PROMPTED	SOLD	SOLD	VALUE	%	QUANTITY
MIDDLESEX	CENTRAL	Action	01720	1	1	100	0	0	0	0	0	0	0
		Chelmsford	01824	1	0	0	0	0	0	0	0	0	0
		Harvard	01451	1	0	0	0	0	0	0	0	0	0
		Ayer	01432	1	0	0	0	0	0	0	0	0	0
		Concord	01742	1	0	0	0	0	0	0	0	0	0
		Woburn	01801										
		Reading	01867										
		North Reading	01864										
		Andover	01810										
		North Andover	01845										
		TOTALS											
				5	1	20	0	5	5	100	5		5
NEW HAMPSHIRE	Hampton Falls	Hampton Falls	03844	1	0	0	0	0	0	0	0	0	0
		Hampton	03842	1	0	0	0	0	0	0	0	0	0
		Portsmouth	03801	1	0	0	0	0	0	0	0	0	0
		Seabrook	03874	1	1	100	0	0	0	0	0	0	0
		Rye	03870	1	0	0	0	0	0	0	0	0	0
		Merrimack	03054										
		Manchester - Downtow	03101										
		Bedford	03110										
		Manchester	03103										
		Nashua	03060										
		TOTALS											
				5	1	20	0	5	5	100	5		5

VALUE SELL / CROSS SELL ANALYSIS

CERTIFIED

DISTRICT	OFFICE	ZIPCODE	TOTAL MAILINGS	TOTAL VALUE SOLD	% SOLD	QUANTITY OF RETURN	TOTAL MAILINGS PROMPTED	TOTAL VALUE SOLD	% SOLD	QUANTITY OF RETURN		
PROVIDENCE	Middleboro	02346	1	0	0	0	1	100	1	1		
		02771	1	0	0	0	1	100	1	1		
		02914	1	0	0	0	1	100	1	1		
		02780	1	0	0	0	1	100	1	1		
		02747	1	0	0	0	1	100	1	1		
		02920					1	100	1	1		
		Garden City					1	100	1	1		
		Cominicut Station	02889				1	100	1	1		
		Kingston Station	02881				1	100	1	1		
		South Attleboro	02703				1	100	1	1		
		TOTALS										
		5	0	0	0	4	100	4	4			
		SPRINGFIELD	West Stockbridge	01266	1	0	0	0	1	100	1	1
				01236	1	0	0	0	1	100	1	1
01002	1			0	0	0	1	100	1	1		
Hadley	01035			1	0	0	1	100	1	1		
Easthampton	01027			1	0	0	1	100	1	1		
Chicopee	01020						1	100	1	0		
Palmer	01069						1	100	1	1		
Great Barrington	01230						1	100	1	1		
South Lee	01260						1	100	1	1		
Northampton	01060						1	100	1	0		
TOTALS												
5	1			0	0	0	100	0	3			



VALUE SELL / CROSS SELL ANALYSIS

CERTIFIED

DISTRICT	OFFICE	OF	OF	ZIPCODE	TOTAL	MAILINGS	UNPROMPTED	TOTAL	VALUE	%	QUANTITY	TOTAL	MAILINGS	PROMPTED	TOTAL	VALUE	%	QUANTITY
WESTERN NEW YORK	Blasdel			14219	1	0	0	0	0	0	0	1	1	1	1	100	1	1
	Hamburg			14075	1	0	0	0	0	0	0	1	1	1	1	100	1	1
	Springville			14141	1	0	0	0	0	0	0	1	1	1	1	100	1	1
	Batavia			14020	1	0	0	0	0	0	0	1	1	1	1	100	1	1
	Eden			14057														
	North Collins			14111														
	Geneva			14456														
	Lima			14485														
	Caledonia			14423														
	TOTALS				4	0	0	0	0	0	0	5	5	5	5	100	95.50%	39
GRAND TOTAL					44	7	15.90%	1	44	42	95.50%	39						

VALUE SELL / CROSS SELL ANALYSIS

INSURED

ZIPCODE OFFICE OF MAILING TOTAL MAILINGS TOTAL MAILINGS PROMPTED TOTAL VALUE OF RETURN SOLD RECEIPTS TOTAL VALUE OF RETURN SOLD RECEIPTS % QUANTITY TOTAL VALUE OF RETURN SOLD RECEIPTS % QUANTITY

DISTRICT

MAILING

ALBANY

Binghamton  
Amsterdam  
Stuyvesant Plaza  
Saratoga Springs  
Voorheesville  
Cobleskill  
Gloversville  
West Lebanon  
Slingerlands  
Ballston Sta

BOSTON

Back Bay Annex  
East Arlington  
Porter Square  
Needham Heights  
Wellesley Hills  
Dorchester Ctr.  
Roslindale  
Grove Hall  
Allston  
Charles Street

13902	1	1	100	0	1	5	4	80	1	5	5	100	0
12010	1	1	100	1	1	5	1	100	1	1	5	100	0
12203	1	1	100	0	0	5	1	100	0	0	5	100	0
12866	1	1	100	0	0	5	1	100	0	0	5	100	0
12186	1	1	100	0	0	5	1	100	0	0	5	100	0
12043	1	1	100	0	0	5	1	100	0	0	5	100	0
12078	1	1	100	0	0	5	1	100	0	0	5	100	0
12195	1	1	100	0	0	5	1	100	0	0	5	100	0
12159	1	1	100	0	0	5	1	100	0	0	5	100	0
12020	1	1	100	0	0	5	1	100	0	0	5	100	0
TOTALS	5	4	80	1	5	5	100	0	0	5	100	0	0
02117	1	0	0	0	0	5	0	0	0	0	5	0	0
02474	1	0	0	0	0	5	0	0	0	0	5	0	0
02140	1	0	0	0	0	5	0	0	0	0	5	0	0
02494	1	0	0	0	0	5	0	0	0	0	5	0	0
02481	1	0	0	0	0	5	0	0	0	0	5	0	0
02124	1	0	0	0	0	5	0	0	0	0	5	0	0
02131	1	0	0	0	0	5	0	0	0	0	5	0	0
02121	1	0	0	0	0	5	0	0	0	0	5	0	0
02134	1	0	0	0	0	5	0	0	0	0	5	0	0
02114	1	0	0	0	0	5	0	0	0	0	5	0	0
TOTALS	5	0	0	0	0	5	0	0	0	0	5	0	0

VALUE SELL / CROSS SELL ANALYSIS

INSURED

DISTRICT	OFFICE	ZIPCODE	MAILING OF	TOTAL MAILINGS	TOTAL VALUE SOLD	% VALUE SOLD	QUANTITY OF RETURN	TOTAL MAILINGS PROMPTED	TOTAL VALUE SOLD	% VALUE SOLD	QUANTITY OF RETURN
CONNECTICUT	Williamantic	06226	1	0	0	0	0	1	100	1	0
	Easthampton	06424	1	0	0	0	0	1	100	1	0
	Stratford Postal Store	06497	1	1	100	1	1	1	100	1	0
	Simsbury	06070	1	0	0	0	0	1	0	0	0
	West Suffield	06093	1	0	0	0	0	1	100	1	0
	Columbia	06237						1	100	1	0
	Middletown	06457						1	100	1	0
	Windsor	06096						1	100	1	0
	Granby	06035						0	0	0	0
	Enfield	06082						1	100	1	1
TOTALS			5	1	20	1	5	4	80	1	
MAINE	York	03909	1	0	0	0	0				
	Kittery	03904	1	1	100	0	0				
	Ogunquit	03907	1	1	100	0	0				
	York Beach	03910	1	0	0	0	0				
	Cape Neddick	03902	1	1	100	0	0				
	Scarborough	04074						1	100	1	0
	South Portland	04116						1	100	1	0
	Portland	04101						1	100	1	0
	Kennebuck	04043						1	100	1	1
	Kennebuckport	04046						1	100	1	0
TOTALS			5	3	60	0	5	5	100	1	

VALUE SELL / CROSS SELL ANALYSIS

INSURED

DISTRICT	OFFICE	OF	MAILING	ZIPCODE	TOTAL	TOTAL	%	QUANTITY	TOTAL	TOTAL	%	QUANTITY	TOTAL	TOTAL	%	QUANTITY
					OF	UNPROMPTED	SOLD	VALUE OF RETURN	PROMPTED	SOLD	VALUE OF RETURN	PROMPTED	SOLD	VALUE OF RETURN	PROMPTED	QUANTITY
MIDDLESEX	CENTRAL	MAILING	Action	01720	1	1	100	0	1	100	0	1	100	0	1	0
			Harvard	01451	1	1	100	0	1	100	0	1	100	0	1	0
			Chelmsford	01824	1	0	0	0	1	0	0	1	0	0	1	0
			Ayer	01432	1	0	0	0	1	0	0	1	0	0	1	0
			Concord	01742	1	0	0	0	1	0	0	1	0	0	1	0
			Gloucester	01930					1			1			1	
			Ipswich	01938					1			1			1	
			Rockport	01966					1			1			1	
			Middleton	01949					1			1			1	
			Lynnfield	01940					1			1			1	
NEW HAMPSHIRE	Seabrook	MAILING		TOTALS	5	2	40	0	5	80	0	5	80	0	5	0
				03874	1	1	100	0	1	100	0	1	100	0	1	0
			Portsmouth	03801	0	0	0	0	0	0	0	0	0	0	0	0
			Rye	03870	1	0	0	0	1	0	0	1	0	0	1	0
			Hampton	03842	1	0	0	0	1	0	0	1	0	0	1	0
			Hampton Falls	03844	0	0	0	0	0	0	0	0	0	0	0	0
			Nashua	03060					1			1			1	
			Manchester	03103					1			1			1	
			Bedford	03110					1			1			1	
			Manchester - Downtown	03101					1			1			1	
NEW HAMPSHIRE	Seabrook	MAILING		TOTALS	3	1	20	0	5	100	3	5	100	3	5	0
				03054					1			1			1	
			Merrimack	03054					1			1			1	
				03060					1			1			1	
			Manchester	03103					1			1			1	
			Bedford	03110					1			1			1	
			Manchester - Downtown	03101					1			1			1	
			Merrimack	03054					1			1			1	
				03060					1			1			1	
			Manchester	03103					1			1			1	

VALUE SELL / CROSS SELL ANALYSIS

INSURED

DISTRICT	OFFICE	OF MAILING	ZIPCODE	TOTAL MAILINGS	TOTAL VALUE SOLD	% VALUE SOLD	QUANTITY OF RETURN RECEIPTS	TOTAL MAILINGS PROMPTED	TOTAL VALUE SOLD	% VALUE SOLD	QUANTITY OF RETURN RECEIPTS
PROVIDENCE	Middleboro	Seekonk	02346	1	0	0	0	1	100	0	1
			02771	1	0	0	0	1	100	0	0
			02914	1	0	0	0	1	100	0	0
			02747	1	0	0	0	1	100	0	1
			02780	1	0	0	0	1	100	0	0
			02920				1	100			
			Garden City				1	100			
			Taunton				1	100			
			Dartmouth				1	100			
			East Providence				1	100			
			Kingston Station				1	100			
			South Attleboro				1	100			
			02703				1	100			
			02881				1	100			
			02889				1	100			
			SPRINGFIELD	West Stockbridge	Housatonic	01266	1	0	0	0	4
01236	1	0				0	0	1	100	0	0
01002	1	0				0	0	1	100	0	0
01035	1	0				0	0	1	100	0	0
01027	1	1				100	0	1	100	0	0
01151							1	100			
Indian Orchard							1	100			
Palmer							1	100			
Great Barrington							1	100			
South Lee							1	100			
Northampton							1	100			
01060							1	100			
01260							1	100			
01230							1	100			
01069							1	100			

VALUE SELL / CROSS SELL ANALYSIS

INSURED

DISTRICT	OFFICE	OF	OF	MAILING	ZIPCODE	TOTAL	TOTAL	%	QUANTITY	TOTAL	MAILINGS	PROMPTED	TOTAL	%	QUANTITY	VALUE OF RETURN	VALUE OF RETURN	%	QUANTITY	RECEIPTS	RECEIPTS	RECEIPTS	RECEIPTS	RECEIPTS
WESTERN NEW YORK	Blasdel				14219	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0
	Hamburg				14075	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0
	Springville				14141	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0
	Batavia				14820	1	1	100	1	1	100	0	1	0	0	0	0	0	0	0	0	0	0	0
	East Amherst				14051	1	1	100	1	1	100	0	1	0	0	0	0	0	0	0	0	0	0	0
	North Collins				14111	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0
	Eden				14057	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0
	Geneva				14456	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0
	Lima				14485	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0
	Caledonia				14423	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0
	TOTALS																							
						5	2	40	0	5	5	5	5	32.60%	2	44	41	93.20%	11					
GRAND TOTAL																								

# VALUE SELL / CROSS SELL ANALYSIS

## REGISTERED

DISTRICT	OFFICE	OF	MAILING	ZIPCODE	TOTAL	MAILINGS	VALUE	UNPROMPTED	SOLD	%	QUANTITY	TOTAL	MAILINGS	VALUE	PROMPTED	SOLD	%	QUANTITY	VALUE OF RETURN	RECEIPTS
ALBANY	MAILING	OF	MAILING	12186	1	0	0	0	0	0	0	1	1	100	1	1	100	0	0	0
				13902	1	1	100	1	100	0	0	1	1	100	1	1	100	0	0	0
				12010	1	1	100	1	100	1	1	1	1	100	1	1	100	0	0	0
				12203	1	1	100	1	100	0	0	1	1	100	1	1	100	0	0	0
				12866	1	1	100	1	100	0	0	1	1	100	1	1	100	0	0	0
				12043	1	1	100	1	100	0	0	1	1	100	1	1	100	0	0	0
				12078	1	1	100	1	100	0	0	1	1	100	1	1	100	0	0	0
				12195	1	1	100	1	100	0	0	1	1	100	1	1	100	0	0	0
				12159	1	1	100	1	100	0	0	1	1	100	1	1	100	0	0	0
				12020	1	1	100	1	100	0	0	1	1	100	1	1	100	0	0	0
				Ballston Station	1	1	100	1	100	0	0	1	1	100	1	1	100	0	0	0
				TOTALS	5	4	80	1	5	4	80	0	0	0	0	0	0	0	0	0
BOSTON	MAILING	OF	MAILING	02474	1	0	0	0	0	0	0	1	1	100	1	1	100	0	0	0
				02140	1	0	0	0	0	0	0	1	1	100	1	1	100	0	0	0
				02117	1	0	0	0	0	0	0	1	1	100	1	1	100	0	0	0
				02494	1	0	0	0	0	0	0	1	1	100	1	1	100	0	0	0
				02481	1	0	0	0	0	0	0	1	1	100	1	1	100	0	0	0
				02459	1	0	0	0	0	0	0	1	1	100	1	1	100	0	0	0
				02134	1	0	0	0	0	0	0	1	1	100	1	1	100	0	0	0
				02467	1	0	0	0	0	0	0	1	1	100	1	1	100	0	0	0
				02125	1	0	0	0	0	0	0	1	1	100	1	1	100	0	0	0
				02114	1	0	0	0	0	0	0	1	1	100	1	1	100	0	0	0
				Charles Street Station	1	0	0	0	0	0	0	1	1	100	1	1	100	0	0	0
				TOTALS	5	0	0	0	0	0	0	5	5	100	5	5	100	4	4	4

VALUE SELL / CROSS SELL ANALYSIS

REGISTERED

DISTRICT	OFFICE	OF	MAILING	ZIPCODE	TOTAL	MAILINGS	VALUE	%	QUANTITY	TOTAL	MAILINGS	VALUE	%	QUANTITY	TOTAL	VALUE	%	QUANTITY

CONNECTICUT

06226 Easthampton  
06424 Stratford Postal Store  
06497 Simsbury  
06070 West Suffield  
06093 Columbia  
06237 Middletown  
06457 Windsor  
06096 Granby  
06435 Enfield  
06082

TOTALS

5 0 0 0 5 3 60 0

MAINE

03909 York  
03904 Kittery  
03907 Ogunquit  
03910 York Beach  
03902 CapeMeddick  
04101 Portland  
04116 South Portland  
04074 Scarborough  
04043 Kennebunk  
04046 Kennebunkport

TOTALS

5 3 60 0 5 5 100 1



# VALUE SELL / CROSS SELL ANALYSIS

## REGISTERED

DISTRICT	OFFICE OF MAILING	ZIPCODE	TOTAL MAILINGS	TOTAL VALUE	% VALUE	QUANTITY OF RETURN RECEIPTS	TOTAL MAILINGS PROMPTED	TOTAL VALUE SOLD	% VALUE SOLD	QUANTITY OF RETURN RECEIPTS
MIDDLESEX CENTRAL	Action	01720	1	1	100	0				
	Harvard	01451	1	1	100	0				
	Chelmsford	01824	1	0	0	0				
	Ayer	01432	1	0	0	0				
	Concord	01742	1	0	0	0				
	Woburn	01801					1	1	100	1
	Reading	01867					1	1	100	1
	North Reading	01864					1	1	100	1
	Andover	01810					1	1	100	0
	North Andover	01845					1	1	100	0
TOTALS			5	2	40	0	5	5	100	3
NEW HAMPSHIRE	Rye	03870	1	0	0	0				
	Hampton	03842	1	0	0	0				
	Hampton Falls	03844	1	0	0	0				
	Portsmouth	03801	1	0	0	0				
	Seabrook	03874	1	1	100	0				
	Manchester	03103					1	1	100	1
	Nashua	03060					1	0	0	0
	Bedford	03110					1	1	100	0
	Manchester-Downtown	03101					1	1	100	1
	Merrimack	03034					1	1	100	1
TOTALS			5	1	20	0	5	4	80	3



# VALUE SELL / CROSS SELL ANALYSIS

REGISTERED

DISTRICT	OFFICE OF MAILING	ZIPCODE	TOTAL MAILINGS	TOTAL VALUE OF RETURN	% QUANTITY	TOTAL MAILINGS	TOTAL VALUE OF RETURN	% QUANTITY	OFFICE OF MAILING	ZIPCODE	TOTAL MAILINGS	TOTAL VALUE OF RETURN	% QUANTITY		
WESTERN NEW YORK	Blasdel	14219	1	0	0	1	100	1	Blasdel	14219	1	0	0		
	Hamburg	14075	1	0	0	1	100	1	Hamburg	14075	1	0	0		
	Springville	14141	1	0	0	1	100	1	Springville	14141	1	0	0		
	Batavia	14020	1	0	0	1	100	1	Batavia	14020	1	0	0		
	East Amherst	14051	1	0	0	1	100	1	East Amherst	14051	1	0	0		
	Gowanda	14070							Gowanda	14070					
	Eden	14057							Eden	14057					
	Canandaigua	14424							Canandaigua	14424					
	Avon	14414							Avon	14414					
	Leroy	14482							Leroy	14482					
	TOTALS			5	0	0	5	100	2	TOTALS			5	0	0
	GRAND TOTAL			45	11	24.40%	43	36	83.70%	GRAND TOTAL			45	11	24.40%
GRAND TOTAL OF ALL 3 SERVICES			132	32	24.20%	131	119	90.80%	GRAND TOTAL OF ALL 3 SERVICES			132	32	24.20%	