

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

RECEIVED

MAR 20 4 58 PM '00

Postal Rate and Fee Changes, 2000]

DOCKET NO. ~~FR2000-1~~ THE COMMISSION  
OFFICE OF THE SECRETARY

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. The instructions contained in my Interrogatories dated February 29, 2000, are incorporated herein.

March 13, 2000

Respectfully submitted,



DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

---

DBP/USPS-42 Please explain the proper handling that would be required for the completion of the Return Receipt with respect to accountable mail sent to a state tax office addressed to the state capital post office but actually delivered to a lockbox operation in another city some 60 miles away and under the jurisdiction of another post office [a] If a rubber stamp is utilized for the signature, is it satisfactory to only show "STATE PROCESSING CENTER" or must it also show the name of the state and it's department, such as "STATE OF XYZ - TAX DEPARTMENT"? Please explain your response. [b] If the mail is addressed to the state capital address and physically delivered to the lockbox, how should the box in part D of the PS Form 3811 be checked? Please explain your response. [c] Does this method of delivering the mail to the addressee or authorized agent at a different address require the filing of a change of address form? Please explain your response. [d] Is there a time limit during which mail may be forwarded in response to a change of address order? If so, what is it? [e] May the rubber stamp utilized for the signature on the PS Form 3811 show the city and state of the state capital even though the mail is not delivered there? Please explain your response.

DBP/USPS-43 Please refer to DBP/USPS-25 with respect to the Census 2000 mailing with incorrect street numbers. [a] Confirm that the letters are sent as First-Class Mail and are endorsed "RETURN SERVICE REQUESTED". [b] Describe the action to be taken by a

delivery office in response to this endorsement. [c] What fees are associated with provision of this service? [d] Were these letters processed in accordance with the established procedure? If not, why not?

**DBP/USPS-44** With respect to the new forms for Certified Mail and Insured Mail receipts, there is box on the top of the form marked "Article Sent To" and at the bottom is a separate three-line box for Name, Street, City. If I send an article addressed to John Q. Public, 100 Main Street, Englewood NJ 07631-1234, what information gets entered into the top box and what information gets entered into the three boxes at the bottom of the form? If any of this information is repeated, please explain the reason for duplication.

**DBP/USPS-45** With respect to the proper completion of PS Form 3811, Return Receipt, as observed on a mailing of twelve [the ones that had a manual signature] Certified Mail letters that I mailed last month, [a] Confirm that the name of the person signing the receipt should be printed in Part A. [b] Please explain why 11 of the 12 receipts that I received did not have the printed name? [c] Confirm that the date of delivery should be entered in Part B. [d] Confirm that the date of the month alone is not a satisfactory entry for the Date of Delivery. [e] Confirm that the month and the date of the month alone is not a satisfactory entry for the Date of Delivery. [f] Confirm that the Date of Delivery must include a month, date, and year to be correct. [g] Please explain why one return receipt did not have any date of delivery and three did not show the year of delivery. [h] Please confirm that one of the two boxes in Part C, namely Agent or Addressee, must be checked in all instances. [i] Please explain why only one return receipt had a check mark. [j] Please confirm that one of the two boxes in Part D, namely Yes or No, must be checked in all instances. [k] Please explain why none of the twelve return receipts had a box checked. [l] Confirm that a mailer, such as myself, would be required to pay \$1.25 to obtain the additional return receipt service on each of the twelve letters that were mailed. [m] Confirm that the printed name box may add to the value of the return receipt service depending on the needs and requirements of the mailer. [n] Confirm that the Date of Delivery information may add to the value of the return receipt service depending on the needs and requirements of the mailer. [o] What is the period of time that the Postal Service will maintain delivery records for accountable mail? [p] Confirm that once the period of time provided in response to Subpart [o] has passed, it

will not be possible for the Postal Service to advise whether a return receipt card with the Date of Delivery shown as 2-11 was February 11, 1997, 1998, or for that matter any given year [other than the dates that fall within the times shown in response to Subpart [o] - assuming that the delivery receipts and the appropriate search have been properly completed]. [q] Confirm that having an accurate date of delivery shown on the return receipt may add to the value of the return receipt service depending on the needs and requirements of the mailer. [r] Please explain why 6 of the 9 tax returns that I filed last year by Certified Mail - Return Receipt had incorrect dates of delivery shown on them. [s] Confirm that the status of the signer, Agent or Addressee, information may add to the value of the return receipt service depending on the needs and requirements of the mailer. [t] Confirm that the checking of the Yes or No box in Part D may add to the value of the return receipt service depending on the needs and requirements of the mailer. [u] Confirm that the Yes or No box in Part D was established so that a mailer would have a positive notation that the delivery address was or was not the same as the address the article was addressed to, namely, without the Yes/No box, no new address shown could either mean that the article was delivered as addressed or the new address was not shown as required. [v] Confirm that a mailer utilizing return receipt service would normally have to assume, unless there was contradictory evidence such as the card showing a date of delivery before the date of mailing or showing a date of delivery after the card was received back, that the date of delivery as shown on the return receipt card was correct. [w] Is a mailer who receives an improperly completed card entitled to a refund of the return receipt fee? If not, why not? [x] What action should a mailer take if the return receipt is returned without being properly completed? [y] Confirm that a mailer may obtain a Duplicate Return Receipt when a return receipt is either not received or is received without being properly completed. [z] Please explain the procedure, in detail, that a mailer must follow to obtain a duplicate. [aa] Confirm that a mailer has the option of either mailing a Certified Mail letter at a post office for postmarking the receipt or just mailing the letter without obtaining a mailing receipt. [bb] Confirm that once the latter has been mailed, either with or without getting the receipt postmarked, the letter is processed and delivered the same way. [cc] Confirm that a mailer who requests a Duplicate Return Receipt will be able to obtain it without payment if he is able to present a postmarked receipt that shows that a return receipt was paid for at the time of mailing. [dd] Confirm that a mailer who requests a Duplicate Return Receipt will be able to obtain it by

making a payment if he is unable to present a postmarked receipt that shows that a return receipt was paid for at the time of mailing. [ee] Confirm that many mailers may not realize the importance of having the mailing receipt postmarked to save the potential cost of a duplicate return receipt. [ff] Why doesn't the mailing receipt indicate this requirement in the last bullet item? [gg] Confirm that the necessity of obtaining a duplicate return receipt will reduce the value of service to most mailers. [hh] Are return receipts checked by a postal employee before they are returned to the mailer? [ii] If so, please advise the items which are checked? [jj] Would proper checking of return receipts eliminate the problems with return receipts? If not, why not? [kk] What percentage of all return receipts receive this post delivery checking? [ll] Please explain and discuss any subparts you are not able to confirm.

DBP/USPS-46 [a] Confirm, or explain if you are unable to do so, that when delivering a Certified Mail article, that the delivery employee must obtain a single signature from the addressee on the Postal Service delivery record [irrespective of whether there is a single article to deliver this way or multiple articles for delivery on some form of manifest]. [b] Confirm, or explain if you are unable to do so, that when delivering a Certified Mail article which contains a Return Receipt, that the delivery employee must obtain two separate signatures from the addressee, one on the Postal Service delivery record [irrespective of whether there is a single article to deliver this way or multiple articles for delivery on some form of manifest] and the second on the Return Receipt card PS Form 3811. [c] Confirm, or explain if you are unable to do so, that when delivering a Return Receipt for Merchandise article, that the delivery employee must obtain two separate signatures from the addressee, one on the Postal Service delivery record [irrespective of whether there is a single article to deliver this way or multiple articles for delivery on some form of manifest] and the second on the Return Receipt card PS Form 3811. [d] Confirm, or explain if you are unable to do so, that the time and therefore costs for obtaining both signatures for Return Receipt for Merchandise service are charged to that service since there is a single fee. [e] With respect to a Certified Mail - Return Receipt Requested article, how are the time and costs allocated between the two separate services? [f] Explain the rationale for such an allocation. [g] Confirm, or explain if you are unable to do so, that the time that it takes to obtain the second signature will usually be less than the time that it takes to get the first signature, or in general,

the time that it takes to obtain both signature will be less than twice the time to obtain only one signature.

DBP/USPS-47 [a] Confirm, or explain if you are unable to do so, that effective June 8, 1997, the service for return receipts changed requiring the delivery employee to indicate the address of delivery if different from the address on the mailpiece. [b] Confirm, or explain if you are unable to do so, that the service available on June 8th represents a difference in the service that was provided at the basic fee on June 7th. [c] Other than the mention on Page 9 of the May 22, 1997 Postal Bulletin, provide references and copies of all directives issued by Headquarters notifying the field of this change. [d] Has the Postal Service conducted any tests to determine the level to which the field is complying with the requirements to provide an updated address when appropriate? [e] If so, provide details and results of the tests. [f] If not, explain why not including reasons why one would consider Return Receipt service to be a quality service, particularly with respect to providing customers with updated addresses.

DBP/USPS-48 [a] Confirm, or explain if you are unable to do so, that Section 822.111 of the Postal Operations Manual [POM] requires that the delivering carrier or window clerk will obtain the signature or authorized signature stamp of the recipient of an article utilizing the Return Receipt Service. [b] Confirm, or explain if you are unable to do so, that POM Section 822.111 also requires the delivery employee must complete the date of delivery if the addressee has not already done so. [c] Would it be reasonable to expect the delivery employee to check to ensure that the Return Receipt has been properly signed? [d] Would it be reasonable to expect the delivery employee to check to ensure that the Return Receipt has the name of the addressee printed in addition to the signature? [e] Would it be reasonable to expect the delivery employee to check to ensure that the Return Receipt has the correct date of delivery entered on it? [f] Would it be reasonable to expect the delivery employee to check to ensure that the Return Receipt has been properly completed? [g] Would it be reasonable to expect the delivery employee to make any necessary corrections to the information provided on the return receipt? [h] Explain any negative answers to subparts c through g. [i] Will the delivery employee referenced in POM Section 822.111 always be an employee of the United States Postal Service? [j] If your response to subpart

h is not an unqualified yes, list all examples and instances in which the delivery employee will not be a USPS employee. [k] Do the requirements of POM Section 822.111 apply to the necessity of having the delivery employee ensure that the Return Receipt is completed at the time of delivery [the time at which the custody of the mail is transferred from the control of the United States Postal Service to the control of the addressee]? [l] If not, explain any instances in which it is not required. [m] Do the requirements of POM Section 822.111 apply to the necessity of having the delivery employee ensure that the Return Receipt is completed at the time of delivery with respect to all agencies, departments, or organizations of the federal government? [n] Same as subpart [m] except with respect to those of any state or local government. [o] Same as subpart [m] except with respect to delivery to any non-government addressee. [p] Do the requirements of POM Section 822.111 apply to the necessity of having the delivery employee ensure that the Return Receipt is completed at the time of delivery regardless of the number of return receipts that are involved in the delivery? [q] Explain and list any instances with respect to any negative answers to subparts [m] through [o]. [r] Confirm, or explain if you are unable to do so, that the delivering employee will be required in all instances to determine if the delivery address differs from the original address shown on the article and if so to provide the new address on the Return Receipt card. [s] Confirm, or explain if you are unable to do so, that the delivering employee will be required in all instances to determine if the delivery address differs from the original address shown on the article and if not to check the box on the return receipt card to indicate that the article was delivered to the same address as originally addressed. [t] Confirm, or explain if you are unable to do so, that the requirements specified in subparts r and s will apply to all types of addressees including, but not limited to, those types mentioned in subparts m through o. [u] Confirm, or explain if you are unable to do so, that the delivering employee will be required in all instances to give all return receipts to the clearing clerk daily. [v] Confirm, or explain if you are unable to do so, that subpart u means that for all return receipts which are being requested for mail which is delivered on a given day will be turned over to the clearing clerk that same day. [w] Confirm, or explain if you are unable to do so, that the requirements specified in subpart u will apply to all types of addressees including, but not limited to, those types mentioned in subparts m through o.

DBP/USPS-49 [a] Confirm, or explain if you are unable to do so, that Section 822.112 of the Postal Operations Manual requires that the clearing clerk must evaluate all return receipts that have been turned in to ensure that they are properly completed. [b] Would it be reasonable to expect the clearing clerk to check to ensure that the Return Receipt has been properly signed? [c] Would it be reasonable to expect the clearing clerk to check to ensure that the Return Receipt has the name of the addressee printed in addition to the signature? [d] Would it be reasonable to expect the clearing clerk to check to ensure that the Return Receipt has the correct date of delivery entered on it? [e] If there are any instances where the return receipt is not given to the clearing clerk on the date of delivery, explain how the clearing clerk would be aware of the date of delivery? [f] Would it be reasonable to expect the clearing clerk to check to ensure that any requirements for restricted delivery have been complied with? [g] Would it be reasonable to expect the clearing clerk to check to ensure that any requirements for notifying the sender of a new address have been complied with? [h] Would it be reasonable to expect the clearing clerk to check to ensure that any requirements for notifying the sender that there is no new address [namely, the box has been checked to show this] have been complied with? [i] What corrective action should the clearing clerk take if in evaluating a return receipt it is noticed that 1. the card is not properly signed, 2. the name of the person signing has not been properly printed, 3. the correct date of delivery has not been shown, 4. the restricted delivery requirements have not been complied with, 5. a new address has not been provided when there is one, or 6. the box has not been checked when there is no new address. [j] Confirm, or explain if you are unable to do so, that all return receipts must be mailed [namely, placed into the mail stream for processing and transporting and delivery to the sender] no later than the first workday after delivery. [k] Explain why POM Section 822.112 does not require that the clearing clerk mail the return receipt card on the date of delivery rather than allowing it to be held until the next workday. [l] Confirm, or explain if you are unable to do so, that the requirements specified in subparts b through j will apply in all instances regardless of the type of addressee or the number of return receipts involved. [m] Confirm, or explain if you are unable to do so, that the clearing clerk referenced in POM Section 822.112 is an employee of the United States Postal Service.

DBP/USPS-50 With respect to the utilization of other than a signature by hand on the return receipt card, confirm or explain if you are unable to do so, that POM Section 822.2 requires that, [a] In those cases where the article is addressed to a federal or state official or agency, a rubber stamp showing the name of the agency or organization may be utilized. [b] This rubber stamp must show the name of the agency or organization and not just the name of an individual. [c] The ability to utilize a printed rubber stamp or other automated means [as opposed to one which has a facsimile of a written signature of an individual] may only be used by a federal or state agency. [d] A federal agency is one in which the employees of the agency are employees of the United States Government. [e] A state agency is one in which the employees of the agency are employees of one of the 50 states of the United States of America. [f] This provision does not apply to other governmental agencies such as, multi-state agencies, counties, municipalities, school districts. [g] This provision does not apply to companies or other non-governmental agencies. [h] For all addressees other than federal and state agencies, the rubber stamp or other automated means must include a facsimile, hand-written signature of the individual who is authorized to accept accountable mail. [i] The type of addressee noted in subpart h may not utilize a rubber stamp or other automated means which contains printed information only [such as the name of the agency]. [j] Explain any non-confirmations.

DBP/USPS-51 [a] Confirm that on August 1, 1996, Sandra D. Curran, Acting Manager, Delivery, sent a letter to all District Managers - Subject: Failure to Obtain Signature on PS Form 3811 Domestic Return Receipt. [b] Confirm, or explain if you are unable to do so, that this letter indicates that all District Managers are to take a proactive approach with all of their delivery offices to ensure that return receipts are not being signed for at a "later", more convenient time and therefore this would require that the return receipt be signed for at the time of delivery. [c] Confirm, or explain if you are unable to do so, that this letter indicates that any long standing, unofficial arrangements that promote or provide for exceptions to the state procedures for "convenience" should be voided if they exist. [d] Confirm, or explain if you are unable to do so, that this letter indicates that a lack of realization by some employees that the customer has paid for this service and any arrangement that makes it easier for the addressee at the expense of that service should not be tolerated. [e] Is this letter still in force? [f] If not, provide a copy of the letter which superseded or modified it. [g]



Provide copies and references of any directives that have been issued since August 2, 1996 which relate to the provision of return receipt service.

DBP/USPS-52 [a] Bottom line, is it a requirement of the United States Postal Service that all accountable mail, including any return receipts that are associated with the mail piece, be signed [this includes the use of a signature stamp under the provisions of POM Section 822.2] for by the addressee at the time of delivery [namely, when the control of the mail piece transfers from the United States Postal Service to that of the addressee] and that the requirements for the completion of the return receipt also be completed at the time of delivery in accordance with the provisions of POM Section 822 and that this applies to any and all addressees throughout the United States who might receive accountable mail and also applies regardless of the quantity of mail involved. [b] If your response to subpart a is not an unqualified yes, provide a complete listing of all exceptions to the requirement and the authority authorizing that exception. [c] Confirm, or explain if you are unable to do so, that the cost for a return receipt is presently \$1.25 and that this charge will apply for each separate accountable mail piece for which return receipt service is desired. [d] Confirm, or explain if you are unable to do so, that should there be 10,000 accountable mail pieces requesting return receipt service being delivered to a single addressee on a given day that each of the senders paid a fee of \$1.25 for the return receipt and that the total revenue received by the Postal Service for processing all ten thousand return receipts will be \$12,500. [e] Confirm, or explain if you are unable to do so, that, on average when there is more than one return receipt involved for a given addressee, the average cost for processing each single return receipt will be less than the cost that would be entailed if the addressee only received a single mail piece requesting return receipt service. In other words, if the cost for handling a single return receipt on average was fifty cents, then the total cost for handling 100 return receipts for a single addressee at one time would be less than fifty dollars [resulting in an average cost of less than fifty cents each]. [f] Do the cost figure for return receipt service take into account the potential savings in delivering multiple pieces at the same time?

DBP/USPS-53 In order to determine that the Return Receipt service provides a value to the mailer, [a] Enumerate and provide details of all studies and tests that have been

performed or conducted by the Postal Service in the past ten years [since Docket R90-1] to determine the mailing public's needs and desires for return receipt service. [b] Same as subpart a except to determine the quality of service being received by return receipt users. [c] Same as subpart a except to determine the extent to which the return receipt service is being provided as mandated in the regulations. [d] Explain why the responses to subparts a through c indicate that the Postal Service is making a concerted effort to provide a quality service. [e] Confirm, or explain if you are unable to do so, that one of the purposes of the return receipt is to provide evidence of delivery to the sender and that this evidence is being provided by an independent third party, namely the Postal Service. [f] Confirm, or explain if you are unable to do so, that the Postal Service used to apply the red validating stamp to return receipts and that this procedure was terminated. [g] When and why was the use of this procedure terminated and provide copies of the directive doing so? [h] Wouldn't the date on the red validating stamp be more likely to be correct than a date that was handwritten? [i] Wouldn't the presence of the red validating stamp on the return receipt provide a greater level of authenticity of the return receipt than one without it? [j] Explain any negative responses to subparts h and i particularly in light of the desire to provide a quality product. [k] Confirm, or explain if you are unable to do so, that the application of a red validation stamp impression on a return receipt by other than an authorized Postal Service employee would be a violation of the law. [l] Are there any plans to resume the use of the red validating stamp? [m] Confirm, or explain if you are unable to do so, that there are times when the actual date of delivery is significant to the mailer utilizing return receipt service. [n] Confirm, or explain if you are unable to do so, that there are times when name of the recipient is significant to the mailer utilizing return receipt service. [o] Confirm, or explain if you are unable to do so, that there are times when prompt notification of delivery is significant to the mailer utilizing return receipt service. [p] Confirm, or explain if you are unable to do so, that provision of the return receipt as proof of delivery and proof of delivery date having been furnished by an independent, disinterested third party, such as the Postal Service, is significant to the mailer at times. [q] Confirm or explain if you are unable to do so, that failure of the Postal Service to process return receipts in the manner specified in the regulations may increase the likelihood of a decrease in value to the mailer who is expecting one of the services noted in subparts m through p.

DBP/USPS-54 DMM Section S915.1.6 states, Return receipt fees are refunded only if the USPS fails to furnish a return receipt. May a refund be claimed for the following: [a] The return receipt which is received back is not signed. [b] The return receipt which is received back does not have the printed name of the recipient. [c] The return receipt which is received back does not show a date of delivery. [d] The return receipt which is received back shows an incorrect date of delivery. [e] The return receipt which is received back does not show a new address where delivered when there is one. [f] The return receipt which is received back does not have the box checked to show that there was no change of delivery address. [g] The return receipt which is received back was mailed by the delivery office later than the next business day following delivery. [h] The return receipt which was received back utilizes a rubber stamp or other automated signature which does not meet the requirements of POM Section 822.2. [i] There is evidence that the accountable mail was delivered to the addressee to complete the return receipt at a later, more convenient time and therefore the return receipt was not obtained by the Postal Service at the time of delivery. [j] The return receipt is not received. [k] A duplicate return receipt indicates that the article was not delivered. [l] The article is returned by the Postal Service without delivery. [m] Confirm, and explain if you are unable to do so, that the referenced DMM section also implies that the return receipt which is furnished meets the requirements of the Postal Service. [n] Explain any of the items for which a refund of the return receipt fee would not be authorized. [o] Confirm, or explain if you are unable to do so, that the necessity of a sender to request a duplicate return receipt just to fix a problem caused by the improper completion of the original return receipt will reduce the value of the service to the mailer.

DBP/USPS-55 [a] How many of the mail processing facilities are now fully equipped with a device which will automatically "trap" a Certified Mail article by the presence of the phosphor ink on the Certified Mail label? [b] How many of the mail processing facilities are partially equipped with such a device? [c] How many of the mail processing facilities are not equipped with such a device? [d] What percentage of the mail is processed through a machine equipped with such a device. Note: Subparts a through c refer to the number of facilities and subpart d refers to the percentage of mail. [e] If there are any facilities listed in response to subparts b or c or if the response to subpart d is not 100%, provide an

implementation schedule as to when that level will be achieved. [f] Confirm, or explain if you are unable to do so, that if there are any facilities which do not have such a device installed then there is an increase in the likelihood that the mailer may not receive the Certified Mail service that was requested. [g] If your response to subpart f is negative, then what purpose is achieved by installing these devices? [h] If you are able to confirm subpart f, explain how the failure to have all facilities equipped with this device can be reconciled with providing a quality service with value to the mailer.

DBP/USPS-56 [a] Confirm, or explain if you are unable to do so, that when accountable mail is delivered, the addressee will be required to sign for the receipt of the mail utilizing either a single receipt form, manifest delivery form, or other computerized listing of the type and number of each accountable mail article. [b] Confirm, or explain if you are unable to do so, that this signature will always be a hand signature. [c] If not, provide the authority [and furnish a copy] which authorizes the delivery without a hand signature. [d] Confirm, or explain if you are unable to do so, that this record of delivery will be maintained in the post office of delivery. [e] Confirm, or explain if you are unable to do so, that these records will be discarded after a period of time. [f] What is the authorized time after which these records may be discarded? [g] Confirm, or explain if you are unable to do so, that a mailer who has a return receipt may receive confirmation of its validity by having the delivery office utilize the delivery record and provide this confirmation. [h] How would such confirmation be accomplished? [i] Confirm, or explain if you are unable to do so, that once the delivery records have been discarded, there will be no record of delivery maintained in the Postal Service. [j] Confirm, or explain if you are unable to do so, that once the delivery record retention period has passed and the records discarded, the mailer may no longer obtain confirmation of the validity of the return receipt. [k] Confirm, or explain if you are unable to do so, that the inability of a mailer to obtain confirmation of the validity of the return receipt could potentially reduce the value of the service to the mailer. [l] Confirm, or explain if you are unable to do so, that the use of the red validating stamp on the return receipt could mitigate or eliminate this potential loss of the value of the service.

DBP/USPS-57 [a] Confirm that the definition for Stamped Cards appears in DMCS section 962.11. [b] Confirm that a Stamped Card is a card. [c] Confirm that a card is a

paper product of uniform thickness of between 0.007 and 0.016 inches, a length of between 5 and 6 inches, and a width of between 3-1/2 and 4-1/4 inches [a combination of the minimum size shown in DMCS Section 6020 and maximum size shown in DMCS Section 222.11 [presently 222.12]. [d] Confirm that a Stamped Card has postage imprinted or impressed on it. [e] Confirm that a Stamped Card is supplied by the Postal Service. [f] Confirm that a Stamped Card is used for the transmission of messages. [g] Explain any nonconfirmations.

DBP/USPS-58 [a] Confirm that the United States Postal Service issued in May 1997 a card with a 20-cent Bugs Bunny stamp on the front and a picture of Bugs Bunny on the reverse. [b] Confirm that these were supplied in a cellophane wrapped book of ten cards. [c] Confirm that the price tag on the back of the package states, "BUGS BUNNY POSTAL CARD BOOK / 10 POSTAL CARDS / ITEM NO. 8982 / PRICE: \$5.95. [d] Confirm that there is a gold seal on the front of the package that states, READY-TO-MAIL / POSTAL CARDS. [e] Confirm that the former name for Stamped Cards was Postal Cards. [f] Confirm that there was / is no difference between the definition for Stamped Cards and Postal Cards. [g] Looking at one of the single cards out of the package of ten, confirm that it is a card. [h] Confirm that this single card meets all of the dimensional standards listed in DBP/USPS-57 subpart c. [i] Confirm that this single card has 20 cents in postage imprinted or impressed on it. [j] Confirm that 20 cents is the postage rate for stamped cards. [k] Confirm that these cards are supplied by the Postal Service. [l] Confirm that these cards may be used for the transmission of messages. [m] Confirm that Fee Schedule 962 presently provides for a fee of \$0.01 in addition to postage for a Stamped Card [rate proposed is \$0.02 in addition to postage]. [n] Confirm that a Stamped Card which has 20 cents postage imprinted or impressed on it should be sold under the provisions of Fee Schedule 962 for a price of \$0.20 plus \$0.01 or a total price of \$0.21 [the proposed rate would be \$0.22 for 20 cents postage]. [o] Confirm that the present price for ten cards would be ten times the price of one card or a total of \$2.10. [p] Confirm that a price of \$5.95 exceeds \$2.10. [q] Explain any nonconfirmations. [r] What is the legal authority for the sale of the above referenced Bugs Bunny cards at a price which exceeds that authorized in Fee Schedule 962? [s] In general, may a refund be obtained by those who have paid a price in excess of that which is authorized in the DMCS? [t] If no, explain and elaborate on any instances where it may not

be. [u] Specifically, with respect to the purchase of Bugs Bunny cards, may a refund be obtained by those who have paid a price in excess of that which is authorized in the DMCS? [v] If not, explain why not. [w] Confirm that one of the provisions of Title 18, United States Code, Section 1721 relates to the price at which postal cards may be sold. [x] If not, explain why not. [y] Has the Postal Service made any requests to Congress or anyone else for a change in the wording of 18 USC 1721? [z] If so, indicate the change that was requested and the date of the request. [aa] Provide a complete listing of all cards that have been sold by the Postal Service since 1971 at a price which exceeds the price of the postage that was imprinted or impressed on them. Provide the date of issue, the subject matter of the card, the value of the postage that was imprinted or impressed on the card, the selling price per card, the number of cards in the set, the total selling price of the set, and the total number of cards or sets that were sold to the public. [bb] With respect to the purchase of cards noted in response to subpart aa, may a refund be obtained by those who have paid a price in excess of that which is authorized in the DMCS and/or 18 USC 1721? [cc] If not, explain why not?

**DBP/USPS-59** The following interrogatories are related to determining how revenue and expenses which apparently are not related to matters under the jurisdiction of the Postal Rate Commission enter into the rate evaluation. [a] For example, how are any profits [revenue minus expense] from such items as International Mail, Philatelic Products, Phone Cards, Money Cards, and sale of merchandise ranging from Fathers Day cards to Bugs Bunny ties taken into account? [b] Do any profits go into the total postal revenues thereby reducing the total amount that must be recovered from postage charges?

**DBP/USPS-60** [a] For each of the past five years, what were the total revenue and expenses for International Mail? [b] For each of the past five years, what were the total revenue and expenses for the sale of Phone Cards and Money Cards? [c] For each of the past five years, what were the total revenue and expenses for the sale of the various items of merchandise as noted above?

**DBP/USPS-61** With respect to the Philatelic Products, [a] for each of the past ten years, what were the total revenue and expenses amounts related to it? [b] With respect to

revenue amounts, what methods are utilized to determine the division of stamp sales between those that will be utilized to pay for mailing as opposed to those that will not be utilized? [c] What are the goals of the Postal Service with respect to the profit levels to be achieved from the sale of Philatelic Products?

DBP/USPS-62 With respect to the delivery of Post Office to Addressee Express Mail, [a] Provide information on the percentage of articles that are delivered by the guaranteed delivery time. Provide records for the past year or more. [b] Confirm that only the mailer [and not the addressee] may make a postage refund claim for delivery made after the guaranteed time. [c] How many articles and what percentage are delivered later than the guaranteed time over the past year or more? [d] How many claims have been filed for return of postage for late delivery for the same time period as utilized in Subpart [c]? [e] Confirm that a mailer must take a specific action to determine that an Express Mail article was delivered late and that without this information will be unaware of the late delivery of the article. [f] Explain any reasons why the percentage of refunds is less than the total number of articles delivered late. [g] Please explain and discuss any subparts you are not able to confirm.

DBP/USPS-63 There is an attachment to response to DFC/USPS-T30-12[a] which provides the raw data for determining the cost of reviewing return receipts. [a] Provide a detailed explanation on how this data has been converted into a cost per return receipt for this portion of the total costs. [b] Provide similar raw data and detailed explanations of the determination of the cost for each of the other components of the total return receipt cost. [c] Provide similar raw data and detailed explanations of the determination of the cost for each of the components utilized in determining the total cost for Certified Mail. [d] Provide similar raw data and detailed explanations of the determination of the cost for each of the components utilized in determining the total cost for Return Receipt for Merchandise. [e] Provide similar raw data and detailed explanations of the determination of the cost for each of the components utilized in determining the total cost for Certificate of Mailing. [f] Provide similar raw data and detailed explanations of the determination of the cost for each of the components utilized in determining the total cost for Delivery Confirmation.

DBP/USPS-64 Provide a breakdown by volume and revenue showing the percentage of Priority Mail that is transported in each of the following categories:

- [1] Direct [as opposed to a hub and spoke] surface transportation
- [2] Direct air transportation
- [3] Hub-to-spoke surface transportation
- [4] Eagle Network
- [5] Other Hub-to-spoke air transportation
- [6] Other methods of transportation [Break out and identify any which have 5% or greater volume or revenue]

DBP/USPS-65 In response to DFC/USPS-48, it was indicated that carriers are able to determine that the postage is correct on DPS mail as it is delivered. [a] Confirm that this evaluation is completed at the delivery point as opposed to at the office. [b] Confirm that letter carriers do not carry accurate postal scales with them while making deliveries on their route. [c] Confirm that the proper postage is a function of the weight of the article. [d] Confirm that the Postal Service has issued a number on stamps without the denomination shown on them. Provide the number of different non-denominated stamps issued. [e] Confirm that carriers normally do not have the values of each of the non-denominated stamps with them? [f] Explain how the letter carrier will be able to evaluate the mail for proper postage without a scale. [g] Explain how a letter carrier will be able to distinguish between a 0.9 ounce letter which requires 33-cents postage and a 1.1 ounce letter which requires 55-cents postage. [h] Explain how a letter carrier will be able to determine that a one ounce letter with an A and a B stamp affixed to it has the proper postage. [i] Explain the details of any non-denominated stamps proposed for the upcoming rate change including whether they will have a letter value on them. [j] Explain and discuss any items you are not able to confirm.

---

---

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

David B. Popkin March 13, 2000

*David B. Popkin* *David B. Popkin*

---

---