

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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Postal Rate and Fee Changes, 2000]

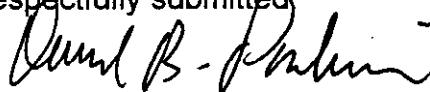
DOCKET NO. R2000-1
POSTAL RATE COMMISSION
SECRETARY

INTERROGATORIES / FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE
UNITED STATES POSTAL SERVICE
POTENTIAL MOTION TO ACCEPT LATE FILING

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. IN THE EVENT THAT THESE INTERROGATORIES ARE NOT RECEIVED BY THE COMMISSION ON THE DEADLINE DATE OF MARCH 23, 2000, I MOVE FOR LATE ACCEPTANCE SINCE THEY WERE MAILED ON MARCH 21, 2000 AND THE US POSTAL SERVICE STANDARD FOR DELIVERY IS TWO DAYS.

March 21, 2000

Respectfully submitted,



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

DBP/USPS-81 On lines 4 and 5 on page 150 of USPS-T-39, the witness stated, "if purchased from a postal facility providing collection." What type of postal facility does not provide collection service?

DBP/USPS-82 On line 12 on page 123 of USPS-T-39, the witness stated, "Postal insurance is automatic with any registered mail valued above \$100." If this an error? If not, please explain.

DBP/USPS-83 Witness 39, and perhaps others, utilizes the phrase "added contingency," or words of a similar import, to determine a final rate [See USPS-T-39 footnote

64 as an example]. [a] Please define and explain this phrase. [b] How has the amount of the added contingency been determined?

DBP/USPS-84 [a] What percentage of postal facilities that have post office boxes provide access to their box section 24 hours a day? [b] Confirm, or explain if you are unable to do so, that these facilities fall into both those that have an employee on duty at the facility and those that do not. [c] What percentage of the total number of post office boxes are accessible 24 hours a day? [d] Confirm that, as a minimum, the box section in a post office should be accessible to the public at all times that a postal employee is on duty at the facility [which in many cases will be greater than the normal hours of retail operation]. If you are unable to confirm, please explain and discuss and provide specific information as to why it cannot be accomplished. [e] Provide information on the reasons which would allow a postal facility to permit access to the post office box section during times when there are no postal employees on duty in the facility. [f] Please provide copies of any directives or instructions that have been issued, if any, regarding the guidelines for determining whether a box section can be open when no postal employee is on duty.

DBP/USPS-85 [a] Please provide a listing of prestigious ZIP Code areas that witness 39 is referring to on lines 1 and 6 on page 104 of USPS-T-39. [b] Please confirm, or explain if you are unable to do so, that boxholders might be interested in having an address in a prestigious post office name but not in a given ZIP Code - for example, in the Princeton NJ area, boxholders might find the Princeton address prestigious, while I really can't imagine them beating down to doors to get a 08542 or 08543 ZIP Code. [c] Provide an estimate of the number of prestigious cities or areas that exist in the country and provide a listing of at least five of them and why you feel they are prestigious. [d] What percentage of the total number of facilities having post office boxes does your response to subpart c calculate to?

DBP/USPS-86 On lines 8 through 11 on page 104 of USPS-T-39, there are two references to receiving mail early in the day as an advantage of having a post office box. [a] Is a postal facility required to post a sign in the box section indicating the time that all mail will be in the boxes? If not, why not? [b] What percentage of the days would you consider

to be reasonable for the mail not to be in the boxes by the posted time. [c] Please discuss your belief why your response to subpart b is reasonable.

DBP/USPS-87 On lines 17 to 20 on page 108 of USPS-T-39, the witness provides the rounding constraints that were used in determining the final rate for post office boxes. [a] Please confirm, or explain and discuss if you are not able to do so, that the use of rounding constraint is to round off the final rate to an even multiple value of that rounding constraint - namely if one uses a rounding constraint of \$10, then the final rate must be a multiple of \$10 such as \$60 or \$70 but not \$75. [b] Please discuss and support the choice of each of the rounding constraints utilized. [c] Specifically describe why you feel that a rounding constraint of \$5 in Group B2 vs. \$2.50 in Group C3 is appropriate since there is only a \$2.50 difference in Box size 1 rates [I have converted all numbers to the minimum rental period]. [d] In a similar manner a rounding constraint for Group C4 is \$2.50 and Group C5 is 50 cents with a \$3.50 difference in Box size 1 rates. [e] Also, please explain the reasonableness of the large rounding constraints when compared to the 10 cent rounding rate utilized for academic institutions [DMM Section D910.4.11].

DBP/USPS-88 For each of the special services rates that utilized a rounding constraint greater than one cent, provide a tabulation of the service, specific category, rounding constraint utilized and the reasons for its choice, the rate that would have been used if there was a rounding constraint of one cent, and the final rate chosen.

DBP/USPS-89 [a] Please confirm, or discuss and explain if you are unable to, that there are a number of post offices where there are two or more separate facilities having post office box service while being under the jurisdiction of the same Postmaster. For each of the following situations of multiple box sections under the same Postmaster, advise whether the fee determination was performed for all of the separate facilities as a group or for each facility separately [b] Main post office and a branch with the same ZIP Code [c] Main post office and a station with the same ZIP Code [d] Main post office and an annex facility in the same area and with the same ZIP Code [e] Main post office and a CPU with the same ZIP Code [f] Same as subpart b except with different ZIP Codes [g] Same as subpart c except with different ZIP Codes [h] Same as subpart d except with different ZIP

Codes [i] Same as subpart e except with different ZIP Codes [j] In those instances where two or more separate facilities had a single rate established for them, please explain the procedure that was utilized. [k] Confirm, or explain if you are unable to do so, that there are facilities where post office boxes have a separate ZIP Code from the street addresses. [l] How will this condition affect the determination of box rents?

DBP/USPS-90 Please clarify and amplify Table 20-A on page 111 of USPS-T-39. [a] What percentage of the Group A facilities and what percentage of the number of individual boxes [regardless of size] will be transferred to Group B2? [b] Same as subpart a except Group A to C3. [c] Same as subpart a except Group B to B2. [d] Same as subpart a except Group B to C3. [e] Same as subpart a except Group B to C4. [f] Same as subpart a except Group C to C3. [g] Same as subpart a except Group C to C4. [h] Same as subpart a except Group C to C5. [i] Same as subpart a except Group D to D6. [j] Same as subpart a except Group D to D7. [k] Provide information on any other possible conversions.

DBP/USPS-91 Confirm, or explain and discuss if you are not able to confirm, that the proposed box rent for Englewood Cliffs, NJ 07632 will be in the highest category box rent in the country.

DBP/USPS-92 [a] What is the distinction between a Group B facility [B2] and a Group C facility [C3/C4/C5]? Are there any characteristics, other than cost, that separate them? [b] Confirm, or explain and discuss if you are not able to confirm, that Groups B2 and C3/C4/C5 rates apply to all facilities that have city delivery service and that this is the only definition for the group and that the determination of which of the four groups will be based on a cost factor. [c] Confirm, or explain and discuss if you are not able to confirm, that Groups D5/D6 rates apply to all facilities that do not have city delivery service but do have either rural or HCR service operating out of that facility and that this is the only definition for the group and that the determination of which of the two groups will be based on a cost factor. [d] Confirm, or explain and discuss if you are not able to confirm, that Group E rates apply to those boxes that are located at facilities whose only delivery method is through the box or by General Delivery [unless the customer is eligible to receive delivery service from some other office -

in which case Group D rates will apply]. [e] Which DMM Section covers each of the two items referred to in subpart d?

DBP/USPS-93 [a] How is the geographic delivery ZIP Code boundary of a non-city delivery post office determined? [b] How is the geographic delivery ZIP Code boundary of a non-delivery post office determined? [c] Define and explain the term, "carrier delivery via an out-of-bounds delivery receptacle" as it appears in DMM Section D910.5.1a/b. [d] If I live in the same building as a non-delivery post office is situated, what box rent group do I pay? [e] Same as subpart d except a different post office has a rural or HCR route that passes the building. [f] Confirm, or discuss and explain if you are not able to confirm, that I may place a rural/HCR box anywhere in the country [assuming that I receive the permission of the property owner] and therefore obtain mail delivery from the rural/HCR carrier when they pass by the box? [g] If you confirm subpart f, explain who would be eligible to receive a Group E box? [h] What are the rules for extending a city delivery, rural, or HCR route to cover additional delivery points?

DBP/USPS-94 [a] What is the average cost for delivering a piece of mail to a customer of a city delivery route [show the cost per 1000 letters in this subpart through subpart e to avoid rounding errors]? [b] What is the average cost for delivering a piece of mail to a customer of a rural carrier route? [c] What is the average cost for delivering a piece of mail to a customer of a HCR route? [d] What is the average cost for delivering a piece of mail to a post office box? [e] What is the average cost for delivering a piece of mail, regardless of the type of address? [f] If the response to subpart d is less than the response to subpart e, confirm, or explain if you are unable to confirm, that there is a savings to the Postal Service to deliver mail to a post office box. [g] If the response to subpart d is less than the response to subpart e, explain how the savings is factored into the rate for post office boxes.

DBP/USPS-95 [a] Explain why the cost factor was chosen to divide box rents into groups rather than some other method such as availability to the box or number of days of delivery to the box. [b] What options were considered and what were the reasons for their dismissal?

DBP/USPS-96 [a] Confirm, or discuss and explain if you are not able to confirm, that the Postal Service makes a business decision to not process a service in accordance with its own rules and advertisements to the public when there is a belief that it would cost more money to comply with the regulations than the penalty for not doing so. Some specific examples for which a specific individual response are: [b] Express Mail which will be impossible to achieve delivery by the guaranteed time will be accepted and the price of making the refund, if requested, is less than it would be to either fix the problem or increase the level of transportation/service. [c] Registered Mail which is handled as ordinary First-Class Mail as noted in the Inspection Service Area Coordination Audit Report on Special Services [USPS-LR-I-200] and the cost of paying a claim will be less than the cost to provide the proper handling of the mail. [d] Return Receipts which are completed by the addressee at a time after delivery without supervision of the Postal Service as mandated because it is easier for the Postal Service to complete them that way and save costs on the assumption that that the mailer will be unaware of the level of service, or non-service, that has been received [e] Insured Mail receives no special protection or handling enroute other than to have the addressee sign for it on the assumption that it is less expensive to pay the claims than to provide the service. [f] Normal collection times are not made as mandated in the POM because it is felt that it would cost too many hours to make the collections that are mandated in the POM and the belief that the mailing public will receive a satisfactory level of service even though it does not meet the requirements. [g] Same as subpart f except because it is felt that it would impact the arrival mail profile at the P&DC and would either require a capital expenditure for more equipment or a greater number of work hours than desired to process the mail for committed delivery standards. [h] Regularly scheduled collection times and retail window service hours are reduced or eliminated in the days on or surrounding holidays because it is believed that it will be possible to save hours while not inconveniencing the public. [i] If a collection box has a posted time on it, can the post office not make the collection by releasing a press story of the reduction to the news media - please limit your response to non-emergency conditions? [j] For each of the subparts above, explain whether the public would perceive the Postal Service's regulations, advertising, and/or claims to be valid, truthful, and/or meaningful with respect to the actual service being rendered as opposed to the service mandated, advertised, or claimed. [k] What action should a customer take when they observe or experience one of the conditions

described above, or for that matter, have any concern or complaint regarding the operation of the United States Postal Service. [l] What action should a customer take when they are unable to receive a comprehensive response within 14 days as mandated by Section 165.1 of the POM? [m] If a customer initially contacts a local Postmaster to resolve a complaint or concern and does not receive a comprehensive response as noted above, please provide a complete listing of the job titles, as well as the order to be followed, which the customer should then contact, for example, District Manager, Area Vice President, etc.

DBP/USPS-97 [a] Confirm, or explain and discuss if you are not able to confirm, that the EXFC program has accomplished the following three results, [1] It has allowed the Postal Service to find the root causes for many of the items which delay the mail and correct them so as to improve the service. [2] It has caused the Postal Service to engage in a high cost system for error correction. For example, before EXFC was in place, a post office receiving a quantity of mail for another office in error, just sent the mail back to the P&DC for delivery on the following day. Now the mail will be specially brought over to the other office so that it can be delivered on the scheduled day. and [3] It has caused post offices to come up with creative methods of manipulating the EXFC score such as a post office making collections before 5 PM at box locations that are mandated to be collected at 5 PM or later so as to achieve a better mail arrival profile at the P&DC and therefore improve the likelihood of a higher EXFC score. [b] Provide and explain any other benefits of the EXFC program.

DBP/USPS-98 [a] Please confirm, or discuss and explain if you are not able to confirm, that compensation for many Postal Service Installation Heads is affected by the EXFC results for their area of responsibility. [b] Other than the Installation Head [Postmaster / District Manager / etc.] provide a listing of the categories of Postal Service Managers whose compensation is affected by EXFC results. [c] Provide an explanation of the method by which the compensation is tied to the EXFC results. [d] Are all EXFC results utilized or is it limited to the overnight score only? [e] If only overnight, please explain why.

DBP/USPS-99 [a] Confirm, or explain and discuss if you are not able to confirm, that EXFC is a measurement for First-Class Mail only. [b] Confirm, or explain and discuss if you are not able to confirm, that all EXFC test mail is prepaid at the single piece rate and is

deposited in collection boxes. [c] Confirm, or explain and discuss if you are not able to confirm, that EXFC pieces are not sent by any of the presorted / automation rates. [d] Provide the results of any studies that have been made showing the extent to which the delivery times of presorted / automation rate First-Class Mail is achieved. [e] Provide the results of any studies that have been made which would allow the EXFC results to serve as a proxy for the automated / presorted mail. [f] Does the EXFC program check all types of First-Class Mail / by shape such as letter, flat, SPR etc., / by method of addressing such as printed, typewritten, or hand written / by method of postage prepayment such as stamped or metered? [g] What percentage of the country's total mail volume [of EXFC type of mail] is tested by the EXFC program? [h] Does the EXFC program make an effort to sample the origin-destination pairs, shape, method of addressing, and method of postage prepayment in proportion to the volume that exists within the entire universe? If not, why not. If so, provide copies of any study. If necessary, separate and discuss each separate criteria. [i] In the event that a post office wishes to eliminate collection from a collection box on a particular date and time, such as might occur on a holiday or a day surrounding a holiday, are they able to notify PriceWaterhouse in advance so that they will not deposit EXFC mail for that omitted collection time [even though the box is posted with that time]? [j] If the response to subpart i is yes, please provide a listing of all instances in which this was done in the past year.

DBP/USPS-100 [a] Confirm that both post cards and stamped cards may be mailed at the same 20-cent postage rate [proposed to be 21-cents]. [b] What is the average cost for acceptance, processing, and delivering a post card? [c] What is the average cost for acceptance, processing, and delivering a stamped card? [d] If separate data is not available, please explain why it is not collected. [e] Provide the existing and proposed cost coverage for the entire First-Class Mail card subclass and for the single-piece First-Class Mail card rates. [f] Confirm that, in general, the cost for handling post cards would be higher than for handling stamped cards. [g] Confirm that the following characteristics would tend to indicate that stamped cards would have a lower cost than post cards: they are more uniform in size, they are more likely to have a printed address, they normally utilize the entire front of the card for the address. [h] Confirm that the following characteristics would tend to indicate that post cards would have a higher cost than stamped cards: they vary in size

[between the authorized limits], they tend to have a glossy surface - both on the front and particularly on the reverse side, they are more likely to be hand addressed, and the left side of the card is normally utilized for a message rather than an address. [i] Explain and discuss any subparts that you are not able to confirm.

DBP/USPS-101 [a] What is the definition of the term, "philatelic products"? [b] What categories of products are included? [c] Confirm, or explain and discuss if you are not able to confirm, that a number of philatelic products contain postage stamps which may be utilized like any other postage stamp to mail letters or contain stamped cards that may be utilized to send messages similar to any other stamped card. [d] How are the prices for philatelic products determined?

DBP/USPS-102 [a] Confirm, or explain and discuss if you are not able to confirm, that the Inspection Service Area Coordination Audit Report on Special Services [USPS-LR-I-200] indicates that there were problems in the Northeast Area with the handling and processing of Registered Mail, Certified Mail, and Return Receipt service. [b] Provide a listing of the reasons why it is felt that these problems are unique to the Northeast Area and would not be expected to occur in the remainder of the country. [c] Provide details of any similar studies that have been requested or conducted in other areas of the country to ensure that these classes of mail are being processed in accordance with proper procedures. [d] Have any follow-up audits been conducted in the Northeast Area. If so, provide details. [e] On a scale of 1 [being the lowest] to 10 [being the highest], how would you rate the level and value of service that the mailing public would perceive getting if they knew all of the facts with respect to processing of Registered Mail in the offices covered by the Audit. Explain your reason for choosing that number. [f] Same as subpart e except for Certified Mail. [g] Same as subpart e except for Return Receipts.

DBP/USPS-103 [a] Please provide a breakdown by one ounce weights showing the number and/or percentage of the total volume of Express Mail articles that are mailed in a flat rate envelope. Over 32 ounces may be shown in a single category if desired. [b] What percentage of the total volume of Express Mail articles that are mailed in flat rate envelopes are under 8 ounces, are between 8 and 32 ounces, and are over 32 ounces? [c] Provide

details of any study or evaluation of Express Mail articles that are mailed in flat rate envelopes and which weigh under 8 ounces as to whether they are paid at the 8 ounce rate [presently \$11.75] or are paid at the flat rate postage [presently \$15.75].

DBP/USPS-104 Most of the rates charged by the Postal Service are weight related. In order to mail the article it may be necessary to affix various labels or other material to the article as well as affix stamps to cover the cost. Please advise whether the following items are included in the weight of the article in determining the proper postage [for example, a Return Receipt card weighs approximately 0.12 ounces]. [a] If I affix one to a 0.95 ounce letter do I pay the one ounce rate because of the original weight of the letter of 0.95 ounces or am I required to now pay the two ounce rate because of the new total weight of 1.07 ounces? [b] The postage stamp or stamps that are affixed to pay the postage. [c] A Certified Mail sticker. [d] A Delivery Confirmation sticker [e] An Insured Mail sticker [f] A Registered Mail sticker [g] An Express Mail address label [h] A C.O.D. Mail label [i] If your response to subparts c, d, e, g, and/or h is yes, am I permitted to remove the mailing receipt part prior to the weight being determined?

DBP/USPS-105 [a] Within the past five years [up to and including R2000-1], has the Postal Service ever claimed in a pleading before the Postal Rate Commission that an improvement in post office box service would result from a granted post office box rate increase? [b] If so, provide details on the number of facilities that have had their service improved over the past five years, the types of improvements that have been made, the total cost of providing all of those improvements, and the total additional revenue that has been received over the past five years as a result of the rate increases as compared to not having raised the box rents at all.

DBP/USPS-106 [a] Confirm, or explain and discuss if you are not able to confirm, that in 1998 the Postal Service attempted to change the rules for processing Return Receipts so as to allow, among other changes, large receivers of accountable mail with Return Receipts to complete the Return Receipt after delivery. [b] What other changes were proposed? [c] Confirm, or explain and discuss if you are not able to confirm, that had the changes been implemented, it would have resulted in a cost savings. [d] Quantify the cost savings noted

in response to subpart c. [e] How are these costs related to the costs provided to the Postal Rate Commission? [f] Confirm, or explain and discuss if you are not able to confirm, that the purpose for proposing these rules was to change an existing method of processing return receipts from one that was specifically prohibited in the rules to change the rules to make it authorized. [g] Specify any other reasons why this rule was proposed. [h] Provide the reasons why the proposed rules were not adopted. [i] Please provide copies of the Federal Register announcements of the proposed change and resolution.

DBP/USPS-107 [a] Confirm that if I have merchandise weighing under thirteen ounces that I may either utilize First-Class Mail or Priority Mail or, as being proposed, Package Services. Neglect the ability to utilize Express Mail in these examples. [b] Confirm that if I have merchandise weighing between thirteen and sixteen ounces that it is the same as subpart a, except that I may not use First-Class Mail. [c] Confirm that if I have merchandise weighing over sixteen ounces that I may either utilize Package Services or Priority Mail. [d] Confirm, or explain if you are not able to do so, that a comparison of all of the characteristics of Package Services vs. Priority Mail, will show that, neglecting the price, Priority Mail will always be equal to or better than Package Services, i.e., the delivery standard for Priority Mail is faster, any parcel between 1 and 70 pounds [proposed to be any parcel up to 70 pounds] may be sent by either service with the same level of preparation, the place of mailing is either the same or better for Priority Mail, Priority Mail will have free forwarding and return, etc. [e] Confirm that a parcel containing merchandise may be insured regardless of whether the postage is paid at the First-Class Mail, Priority Mail, or Package Services rate. [f] Confirm that a parcel containing merchandise may be registered regardless of whether the postage is paid at the First-Class Mail, or Priority Mail rate. [g] Confirm that when Registered Mail is utilized, there is an accounting for each individual mailpiece between the accountable mail section of the delivering post office and the delivering employee. [h] Confirm that when Insured Mail is utilized, there is no accounting for each individual mailpiece nor even for the total number of insured parcels between the accountable mail section of the delivering post office and the delivering employee. [i] Confirm that when Registered Mail is utilized there is an accounting for the mail as it progresses through the mail system from the acceptance to the delivery. [j] Confirm that when Insured Mail is utilized, there is no accounting for the parcel at any time other than

when the acceptance employee provides the mailer with a receipt and when the delivering employee obtains a receipt from the addressee. [k] Confirm that for the acceptance of the article and the delivery of the article, the security and accountability between Registered Mail and Insured Mail is either identical or better for Registered Mail. [l] Confirm that for the time between the acceptance of the article and its ultimate delivery, the accountability and security provided to Registered Mail will be greater than that provided to Insured Mail. [m] Confirm that, ignoring any price differential, a knowledgeable mailer with a merchandise parcel weighing up to 70 pounds [under the proposed rates and 1 to 70 pounds under the existing rates] will always choose Priority Mail - Registered Mail over Package Services - Insured Mail. [n] If you provide any examples where the knowledgeable mailer referred to in subpart m would choose Package Services - Insured Mail over Priority Mail - Registered Mail, provide an estimation of the percentage of parcels out of the total number of parcels handled would fall into that category. Remember, that any price differential must be ignored. [o] Confirm that the fee for Registered Mail for an article with a value of \$5,000 insurance is presently \$9.50 and proposed to be \$12.00. [p] Confirm that the fee for Insured Mail for an article with a value of \$5,000 insurance is presently \$48.35 and proposed to be \$51.10. [q] Confirm that a mailer having a parcel for which \$5,000 insurance is desired presently pays \$38.85 and is proposed to pay \$39.10 more for Insured Mail compared to Registered Mail. [r] Confirm that at the present time the crossover between Registered Mail and Insured Mail fees is \$600.01 value and under the proposed rates will be a \$700.01 value [where the Insured Mail fee becomes higher than the Registered Mail fee]. [s] Based on the above, confirm that a knowledgeable mailer with a parcel containing merchandise and weighing under one pound and for which \$5,000 insurance coverage is desired will always choose Registered Mail over Insured Mail. [t] Based on the above, confirm that a knowledgeable mailer with a parcel containing merchandise and weighing over one pound and for which \$5,000 insurance coverage is desired will always choose Registered Mail over Insured Mail in those rate cells where the Priority Mail rate is presently less than \$38.85 [proposed to be \$39.10] more than the Package Services rate for the same zone and weight. [u] Provide a listing of all Package Services rate cells where the existing Priority Mail rate for the same zone and weight is \$38.86 or more greater than the existing Package Services rate for the same zone and weight. Provide a similar listing for the proposed rates and \$39.11 or more. [v] What percentage of all parcels sent by Package Services or Priority Mail fall into those

rate cells provided in response to subpart t? [w] What would United Parcel Service charge an individual shipper for \$5,000 insurance? [x] Based on the above, how could a knowledgeable mailer perceive the rates for insurance as being fair and equitable? [y] Confirm that the rate for Express Mail insurance is presently \$42.75 and is proposed to be \$45.00 for \$5,000 coverage. [z] Confirm that a mailer having a parcel for which \$5,000 insurance is desired would pay \$33.25 [proposed to be \$33.00] more for Express Mail Insured Mail compared to Registered Mail. [aa] Confirm that Express Mail may not be registered. [bb] If so, provide a rationale for such a regulation. [cc] Confirm that the rate for Express Mail will always be greater than that for Priority Mail. [dd] Confirm that the level of service for Express Mail will always be greater than or equal to that for Priority Mail. [ee] What do United Parcel Service, Federal Express, and other major carriers charge their individual overnight shippers for \$5,000 insurance? [ff] Based on the above, how could a knowledgeable mailer perceive the rates for Express Mail insurance as being fair and equitable. [gg] Confirm, or explain if you are unable to do so, that a mailer with a parcel for which \$5,000 coverage may decide to accept the slower Priority Mail compared to the faster Express Mail because of the added \$33.25 difference [proposed to be \$33.00] in insurance rates between Registered Mail and Express Mail insurance rates. [hh] Please provide a logical explanation as to why the insurance rates are much higher than the corresponding registry rates for the higher values of insurance. [ii] Please explain and discuss any subparts that you are not able to confirm.

DBP/USPS-108 Please provide copies of any audits conducted in the past five years by the Inspection Service concerning the extent to which the Postal Service collection from street letter boxes meets the requirements of the Postal Operations Manual and/or Headquarters directives.

DBP/USPS-109 Refer to the response to DFC/USPS-T39-37 in which the witness refers to witness Landwehr's testimony. Please confirm, or explain and discuss if you are unable to confirm, that since the Commission rejected the proposal, the weight given to the testimony is also zero.

DBP/USPS-110 Refer to the response to DFC/USPS-41[h]. [a] If a special Priority Mail collection box has a Sunday collection time listed on it, would that provide an expectation that the box would be collected and the mail processed on Sunday? [b] In a similar manner, if a mailer was advised by a retail window clerk at an open Sunday facility that the mail would be processed, would that provide an expectation of processing?

DBP/USPS-111 Refer to the response to DFC/USPS-T34-49, please provide a copy of the latest available PETE results.

DBP/USPS-112 Please refer to the response to DBP/USPS-7 [incorrectly shown on the response as DBP/USPS-T40-7 - as are other interrogatory responses] in which you indicated that the calculated cost per square foot for Englewood Cliffs was greater than \$30 based on the total annual rent divided by the total square feet. Without seeing the actual numbers, I have a real hard time understanding how Englewood Cliffs could be singled out for the rate increase. It is a small facility with approximately 1750 square feet [29' 6" by 59' 4"]. It is located in a strip mall of three other stores on the first floor and offices on the second floor in a 40-year old building [the plaque on the post office wall is 1960]. If Englewood Cliffs became a Group B, I am at a loss to see why instead of 29 offices changing rates it would not be in the thousands. [a] How is the "total annual rent" of a facility determined? [b] Is it the total dollar amount that is paid by the Postal Service to the owner of the building [or other party collecting the money] regardless of how the costs may be broken out in the agreement to cover different portions of the property? If not, please explain and clarify. [c] How is the "total square feet" of the facility determined? [d] Is it the total square footage of all of the property that is being leased to the Postal Service or is it the total of only the building items themselves? [e] Confirm, or explain and discuss if you are not able to confirm, that "calculated cost per square foot" is the magic number utilized to determine the box rent. [f] For my ability to understand the method of determining the "calculated cost per square foot", let me pose a hypothetical office with the following parameters. Please advise the "calculated cost per square foot" and show in detail how it was determined.

Area of the building utilized for the box section	1800 square feet
Area of the building utilized for other operational needs	4000 square feet
Area of the building utilized for office and administrative needs	1000 square feet

Area of the building utilized for storage needs	1500 square feet
Area of the front sidewalk	500 square feet
Area of the platform/dock at the rear of the building	1000 square feet
Area of parking spaces dedicated to the facility	2000 square feet
Maneuvering area and temporary parking area by the dock	3000 square feet
Outside storage area such as a dumpster	200 square feet
Area of grass, trees, and other landscaping	2500 square feet
Area of the driveway access to the platform/dock area	1300 square feet
Total rental charge paid annually	\$130,000

[g] Are there any other generic types of area that might exist at a facility that I did not mention in my example? If so, identify them and indicate whether they would be included in the calculation or not. If included, provide details. [h] Provide details on the purpose and use of the 58 control facilities in neighboring areas that will be monitored to serve as a benchmark. [i] What specific offices are being utilized for Englewood Cliffs? [j] Please provide, in detail, the procedure that will be utilized to determine the rental fee for space located in buildings that are privately owned. [k] Please confirm, or explain and discuss if you are not able to confirm, that, for the purpose of box rent calculations, there are only two categories - those facilities that are located in buildings owned by the US Government whether it is the Postal Service or GSA or some other federal agency and those facilities which are not located in buildings owned by the US Government. [l] If you are not able to confirm subpart k, please provide, in detail, the procedure that will be utilized to determine the rental fee for each of the other categories.

DBP/USPS-113 The response to DBP/USPS-7 indicated that the purpose of changing only 29 offices was to gain operational experience with fee changes driven by location cost. [a] Please provide, in detail, any operational experience that was gained by studying the 29 offices. [b] Please provide the operational experience that was gained by studying Englewood Cliffs.

DBP/USPS-114 The response to DBP/USPS-8 indicated the proposed fee group for all of the 076 offices. [a] The listing does not provide a response for 07606 and 07663. Please provide. [b] Was Tenaflly 07670 calculated before or after the major renovation that was

completed recently? [c] How often and under what circumstances will offices be reevaluated for potential changes of their Group? [d] Provide any insight as to why 81% of the Group C facilities will become Group C3, the highest of Group C. [e] Explain why Alpine 07620 is a Group D office rather than a Group E office. [f] If a resident of another area which has city delivery service goes to a Group E office, what Group rate is paid. [g] Same as subpart f except for rural/HCR delivery only. [h] Same as subpart f, except for a resident who does not have access to delivery service.

DBP/USPS-115 [a] Regarding the response to DBP/USPS-14, confirm, or explain and discuss if you are not able to confirm, that the level of service for the various delivery categories is the same for all offices in the country. [b] Confirm, or explain and discuss if you are not able to confirm, that having a delivery made on a given day of the year contemplates that there will be new mail arriving at that office for delivery. [c] Please confirm, or explain and discuss if you are not able to confirm, that the specific authority to have less than six days a week delivery relates to both on a permanent/semi-permanent basis as well as on a temporary or seasonal basis. [d] Please reevaluate your POM reference under City Delivery Routes. [e] Please provide regulatory reference which authorizes seasonal city delivery routes. [f] Provide a definition for the term seasonal city delivery route which includes both the range of days per week and the weeks per year that will occur. [g] Are all business customers who are either open on Saturday or have a mail receptacle which may be accessed by the carrier on a Saturday entitled to receive city delivery [unless they specifically request non-delivery on Saturday]? [h] If not, why not? [i] What is the official title of the Area Manager? [j] With respect to delivery to post office boxes, provide a regulatory reference which authorizes service less than six days a week. [k] Your response to the level of service at post office boxes states that service will be available when the post office is open and the post office box section is accessible. Is it required to have the post office open and the box section accessible six days a week? [l] With respect to response [3], is it required to have the post office lobby open six days a week? [m] If your response to subparts k and/or l is no, provide the reasons when it would not be and the regulatory authority authorizing it. [n] Please enumerate the specifics of the limited authority that a Postmaster may have in those instances where it is mentioned. [o] Please confirm, or explain and discuss if you are not able to confirm, that response [2] when

taken together with response [1] and potentially responses [4] and [5] could allow for carrier delivery on a given day when there is no delivery to post office boxes - for example, even though the post office box section is not open and accessible on a Saturday [the most likely day for this to occur] carrier delivery must still be made that day. [p] If your response to subpart o is confirmed, explain how one could consider post office box delivery to be a high value service when compared to carrier delivery since carrier delivery would occur on more days of the week than post office box delivery. [q] Please provide the definition of the first word in your response, "Generally". Does it mean that there will always be six day a week delivery at all facilities and types of addresses unless a specific exception has been provided in your response? If not, provide all of the other conditions where six day a week delivery is not available. [r] Please explain why it was necessary to utilize the word generally in your response for both post office boxes and General Delivery. Provide the specifics of any conditions which would allow for less than six days a week delivery.

DBP/USPS-116 Please provide the Box Group and whether or not the building located at 1675 7th Street, Oakland CA with box section using a ZIP Code of 94623 is government owned.

DBP/USPS-117 In the response to DBP/USPS-15[c], it appears that the words "with absolute certainty" were overlooked in the response. [a] Please answer again or explain why it is not necessary. [b] If, under the present rates. I bring a three pound machinable package going from New Jersey to California to the post office for mailing with \$400 insurance, confirm that the required postage would be \$4.25 postage and \$4.65 insurance for a total of \$8.90. [c] If the only stamps that I have with me are \$11.75 stamps and I put one of them on the package. Will the package be accepted for mailing? If not, why not? [d] If the package were to be mailed in a California post office addressed to another California city ten miles away in the same BMC but still has my New Jersey return address, confirm that the required postage is \$3.17. [e] If the only stamps that I have with me are \$11.75 stamps and I put one of them on the package. Will the package be accepted for mailing? If not, why not? [f] Now explain to me how you would be able to determine the insurance value, with absolute certainty, for either of these two parcels if you observed them in the mail stream. [g] Please estimate the percentage of insured parcels that you feel an employee will actually

take the parcel out of the system, weigh it, calculate the required postage based on any one of several rates, look at the total postage paid on the parcel, subtract the cost of the postage alone, and then assume that the remainder was for the insurance fee and calculate the insurance value from that. Assume that this applies to all employees other than the window clerk who accepted the parcel or others in the immediate area. [h] Since you have indicated that no special security or handling applies to an insured parcel whether it is insured for any value between \$50.01 and \$5000.00, please confirm, or explain and discuss if you are unable to confirm, that the rates for insurance between \$50.01 and \$5000.00 should be based on the paying the claims for lost and damaged parcels. [i] Please provide a tabulation of the total number of parcels that are insured at each rate category, the number of parcels for which a claim was made, and the average value of the claim. [j] Is the cost of processing a claim independent of the value? If not, why not? [k] What is the cost of processing a claim? [l] Please provide a detailed explanation of how one would convert the data provided in response to subparts i, j, and k into the proposed rates. [m] How did you calculate the proposed rates. Provide a detailed explanation.

DBP/USPS-118 [a] Confirm, or explain and discuss if you are not able to confirm, that generally the same level of security and transportation will be provided for a Registered Mail letter whether it has no insured value or is insured for the \$25,000 maximum. [b] If I were to mail a one ounce letter registered for \$200, please confirm that the required postage would be 33 cents plus \$6.75 registry fee for a total of \$7.08. [c] If the only stamps that I have with me are \$11.75 stamps and I put one of them on the letter. Will the letter be accepted for mailing? If not, why not? [d] Now explain to me how you would be able to determine the insurance value, with absolute certainty, for this letter if you observed it in the mail stream. [e] Please estimate the percentage of registered letters that you feel an employee will actually take the letter out of the system, weigh it, calculate the required postage, look at the total postage paid on the letter, subtract the cost of the postage alone, and then assume that the remainder was for the registry fee and calculate the insurance value from that. Assume that this applies to all employees other than the window clerk who accepted the letter or others in the immediate area. [f] Since no special security or handling applies to an registered letter whether it is insured for any value up to \$25,000, please confirm, or explain and discuss if you are unable to confirm, that the rates for Registered Mail valued up to

\$25,000 should be based on the paying the claims for lost and damaged articles. [g] Please provide a tabulation of the total number of letters that are registered at each rate category, the number of letters for which a claim was made, and the average value of the claim. [h] Is the cost of processing a claim independent of the value? If not, why not? [i] What is the cost of processing a claim? [j] Please provide a detailed explanation of how one would convert the data provided in response to subparts g, h, and i into the proposed rates. [k] How did you calculate the proposed rates. Provide a detailed explanation.

DBP/USPS-119 Refer to the Proposed Classifications shown on page 13 of USPS-T-40. [a] Please provide a similar table that makes the distinction between the present Groups A, B, and C. [b] Is the dollar value representing cost the same in both the table on page 13 and the response to subpart a? [c] If not, explain the difference. [d] How were the specific dollar values chosen in both the existing rates as well as the proposed rates? [e] Are they arbitrary dollar values or do they represent a specific distinction in type of facility? Please explain. [f] Were they chosen to allow for a certain total increase in box rent income? [g] Are there any present Group A boxes with a cost of < \$10.00? [h] If so, why are they proposed for Group C3 rather than C4 or C5? [i] Are there any present Group B boxes with a cost of < \$7.50? [j] If so, why are they proposed for Group C4 rather than Group C5? [k] Do you feel that a large negative rate shock would upset the customer? If so, why?

DBP/USPS-120 [a] Please provide an explanation that a distinction between post office box rates at offices that have city delivery service compared to those that have only rural/HCR service is appropriate. [b] Please provide an explanation that determining post office box rents based on the cost of the facility is appropriate? [c] Are there any other criteria utilized, either for the present system or the proposed system? [d] If so, enumerate and explain why they are appropriate. [e] Please enumerate the criteria that were considered and rejected and provide reasons why they were not appropriate. [f] Was the availability of access to the box section [this means both the greater access on a given day - such as 24 hour a day access - and the limitation of access to only 5 or 6 days rather than 7] evaluated as a potential rating factor? [g] If so, why was it rejected?

DBP/USPS-121 On page 20 of USPS-T-30 reference is made to a special study that was conducted to determine the costs for post office box key and lock changes. [a] What method was utilized to determine the 30 offices that participated in the survey? [b] How many facilities are there in the country that provide box service? [c] What level of confidence does the choice of a sample of 30 provide when evaluating the costs at the entire universe of facilities provided in response to subpart b? [d] Justify that your level of confidence was appropriate and provide the calculations utilized to determine your response to subpart c. [e] Please provide the raw data of your survey in a similar manner as you did for the response to DFC/USPS-T30-12[a]. [f] Provide a copy of USPS-LR-I-108, pages 68 through 71. [g] Provide data or an estimate of the number of additional post office box keys are requested each year and the number of lock changes made - specify the source of the data for your response. [h] You indicated that the source for lock changes is the post office's preexisting inventory. Are all replacements of key operated locks made by removing the lock mechanism from the box by removing one or more screws and then replacing it with another lock mechanism? If not, please explain. [i] Confirm that all post office boxes are either opened by means of a key or by dialing a combination. If not, explain. [j] Does your proposal for a lock replacement fee also apply for the change of combination to the lock? [k] If not, what will the charge be to change the combination? [l] Please describe the method utilized to change the combination to a combination lock. [m] What percentage of the boxes in the country have key-operated locks, combination locks, and any other method listed in your response to subpart i? [n] What is the source of duplicate or replacement keys? [o] If a customer replaces his lock on the box, how many new keys are provided and what fee, if any, is charged for them? [p] Will there be a different cost for key duplication or replacement based on whether the extra key was already in inventory at the office as opposed to whether one must be obtained? [q] What procedure is followed if the extra key is not in inventory? [r] Provide separate data for key replacements for these two separate conditions listed in subpart p. [s] Provide an estimate of the range of costs for a normal key duplication at a hardware store. [t] Are all post office box keys marked DO NOT DUPLICATE or words of a similar import? [u] Provide any insight as to the comparison of your \$4 fee for key duplication with the value provided in response to subpart s.

DBP/USPS-122 Please respond to the following question under the headings and context of DBP/USPS-19 as follows: If collections are made at a collection box on a regular basis, then that collection time must be shown on the box.

DBP/USPS-123 Please respond to the following questions under the headings and context of DBP/USPS-65 as follows: [a] Confirm that the proper postage is a function of the size of the piece [namely, one ounce pieces outside a certain range require a surcharge]. [b] Confirm that this would require that the carrier have a ruler or template to determine compliance. [c] Confirm that carriers do not normally carry rulers or templates with them to the field.

DBP/USPS-124 Refer to the response to DBP/USPS-1. [a] Confirm that the use of nineteen [I have omitted the check digit] unique digits will result in a total of ten quintillion unique article numbers. [b] Provide an estimate of the number of years that it would take to use up ten quintillion article numbers before repeating them - please provide details of your estimation procedure. [c] What is the purpose of the check digit and how is it determined? [d] Refer to the response to subpart d, provide a listing of any items which will subtract from the value of service. [e] Provide a listing of any items which will be neutral with respect to the value of service. [f] Evaluate your responses to DBP/USPS-1[d] and subparts d and e above, and indicate what the overall change in value of service will be - positive, negative, or neutral. Discuss the reason for your choice. [g] Please explain why the increase to a 20-digit number was necessary to allow for electronic data capture of delivery information and recipient signatures. [h] Why wouldn't the existing 9-digits serve this purpose? [i] If 9-digits is not sufficient, why wasn't a number between 10 and 19 chosen? [j] Confirm that the present label is broken up into three groups of three digits [plus a single prefix letter]. [k] Explain why you feel that copying five groups of four digits will be an addition to the value of the service when compared to a letter and three groups of three digits. [l] How many mailers print their own Certified Mail labels? [m] What is wrong with the present system that mailers are given a block of numbers? [n] Please reevaluate your response to subpart j in which you state that the same number of digits must be used for all numbers with the response in DBP/USPS-2 for Registered Mail. [o] Refer to your response to DFC/USPS-T39-38 f-g which were referred in the response to DBP/USPS-1 subpart k. How could the

removable label create a machineability problem when it would be the same glue and paper as the service label that is already utilized? [p] Please provide that data that you utilized to determine that increasing the height of the gum by approximately 1/4 inch, printing a number on the strip, and adding a second perforation would cost more than the time for a window clerk to record the number. [q] What percentage of all Certified Mail - Return Receipt transactions have the number entered on the receipt by the window clerk?

DBP/USPS-125 Refer to your response to DBP/USPS-2. [a] In response to [5], explain how the number gets transcribed to the original 3849 form. [b] Your response to [6] refers to a library reference. Please provide a copy of the ENTIRE USPS-LR-I-168.

DBP/USPS-126 Please furnish a copy of USPS-LR-I-231 that was used to respond to my interrogatory DBP/USPS-4.

DBP/USPS-127 [a] Refer to your response to DBP/USPS-5-i-3. Are there any containers that are utilized for both Priority Mail and Express Mail? [b] Refer to your response to DBP/USPS-5-i-5. Are there any envelopes which may be utilized as an Express Mail flat-rate envelope? If so, provide details.

DBP/USPS-128 With respect to the processing of Priority Mail in the areas covered by a PMPC, answer and explain each of the following: [a] Does the Postal Service pay Emery a fee for each Priority Mail article that they process? [b] Is there a financial advantage to process a Priority Mail article outside of the Emery system? [c] Is there an operational advantage to process a Priority Mail article outside of the Emery system? [d] To what extent does the Postal Service trap Priority Mail articles, such as those destinating locally, in the same P&DC area, and/or in nearby P&DC areas so that the article will be transported outside of the Emery system?

DBP/USPS-129 Refer to the response to DBP/USPS-3. [a] Provide details on the extent to which your yes response to subpart d applies. Is it nationwide? [b] Regarding the response to subpart e, provide a listing of each of the previous editions of this form and whether or not there is tagging. [c] Will the tagging on previous versions of Form 3800 also

act in the same manner as the July 1999 version? [d] Regarding the response to subpart f, explain why the word "most" was used before BCSs and "if so designated" was used at the end of the sentence. Explain and describe the extent to which this sorting takes place. [e] Regarding the response to subpart g, is the second and third sentence the only example that you are not able to provide an unconditional confirmation? If not, please provide other examples. [f] Please provide a copy of USPS Form 3812 referred to in your response.

DBP/USPS-130 On March 1, 2000, Attorney David H. Rubin provided me with a copy of LR-I-181 and indicated that I could obtain copies either through formal discovery or with a FOIA request. Formal discovery is easier and quicker so, please provide me with copies of the following reports:

- [a] Page 87 2/18/99 311-1262203-PA(3) - Registered Mail Operations
- [b] Page 87 4/30/98 029-1217904-PA(1) - National Audit on External First-Class Collections
- [c] Page 87 8/10/98 050-1231591-PA(2) - Two-Three Day Mail and Priority Mail, Washington DC 20066
- [d] Page 87 4/10/98 051-1218053-PA(3) - Mail Service Between EXFC and Non-EXFC Cities, Orlando FL 32862
- [e] Page 93 9/29/99 DS-AR-99-003 - Government Mails Section of the Brentwood Processing and Distribution Center, Washington DC.

DBP/USPS-131 Attached to this pleading is a letter dated September 24, 1999, as Attachment A. [a] Please verify that this letter was prepared and sent to me by an employee of the United States Postal Service. [b] Please confirm, or explain and discuss if you are not able to confirm, that the procedures utilized by the Atlanta Post Office to process the completion of the Return Receipts on accountable mail destined to the Internal Revenue Service and the Georgia Income Tax Division is similar to the problems that were observed by the Inspection Service at the Andover, Massachusetts Internal Revenue Service as noted in the Inspection Service Area Coordination Audit Report on Special Services [USPS-LR-I-200]. [c] Please confirm, or explain and discuss if you are not able to confirm, that the procedures utilized by the Atlanta Post Office to process the completion of the Return Receipts on accountable mail destined to the Internal Revenue Service and the Georgia

Income Tax Division do not meet the requirements of the Domestic Mail Manual [Section D042.1.7], Postal Operations Manual [Section 822.11], and Headquarters Directives. [d] Please confirm, or explain if you are not able to do so, that customers who purchased the referenced Return Receipt service did not receive the service that they paid for.

DBP/USPS-132 Attached to this pleading is a letter dated September 24, 1999, as Attachment B. [a] Please verify that this letter was prepared and sent to me by an employee of the United States Postal Service. [b] Please confirm, or explain and discuss if you are not able to confirm, that the procedures utilized by the Memphis Post Office to process the completion of the Return Receipts on accountable mail destined to the Internal Revenue Service is similar to the problems that were observed by the Inspection Service at the Andover, Massachusetts Internal Revenue Service as noted in the Inspection Service Area Coordination Audit Report on Special Services [USPS-LR-I-200]. [c] Please confirm, or explain and discuss if you are not able to confirm, that the procedures utilized by the Memphis Post Office to process the completion of the Return Receipts on accountable mail destined to the Internal Revenue Service do not meet the requirements of the Domestic Mail Manual [Section D042.1.7], Postal Operations Manual [Section 822.11], and Headquarters Directives. [d] Please confirm, or explain if you are not able to do so, that customers who purchased the referenced Return Receipt service did not receive the service that they paid for.

DBP/USPS-133 Attached to this pleading is a letter dated October 26, 1999, as Attachment C. [a] Please verify that this letter was prepared and sent to me by an employee of the United States Postal Service. [b] Please confirm, or explain and discuss if you are not able to confirm, that the procedures utilized by the Philadelphia Post Office to process the completion of the Return Receipts on accountable mail destined to the Internal Revenue Service is similar to the problems that were observed by the Inspection Service at the Andover, Massachusetts Internal Revenue Service as noted in the Inspection Service Area Coordination Audit Report on Special Services [USPS-LR-I-200]. [c] Please confirm, or explain and discuss if you are not able to confirm, that the procedures utilized by the Philadelphia Post Office to process the completion of the Return Receipts on accountable mail destined to the Internal Revenue Service do not meet the requirements of the Domestic

Mail Manual [Section D042.1.7], Postal Operations Manual [Section 822.11], and Headquarters Directives. [d] Please confirm, or explain if you are not able to do so, that customers who purchased the referenced Return Receipt service did not receive the service that they paid for.

DBP/USPS-134 Attached to this pleading is a letter dated September 28, 1999, as Attachment D. [a] Please verify that this letter was prepared and sent to me by an employee of the United States Postal Service. [b] Please confirm, or explain and discuss if you are not able to confirm, that the procedures utilized by the Cincinnati Post Office to process the completion of the Return Receipts on accountable mail destined to the Internal Revenue Service is similar to the problems that were observed by the Inspection Service at the Andover, Massachusetts Internal Revenue Service as noted in the Inspection Service Area Coordination Audit Report on Special Services [USPS-LR-I-200]. [c] Please confirm, or explain and discuss if you are not able to confirm, that the procedures utilized by the Cincinnati Post Office to process the completion of the Return Receipts on accountable mail destined to the Internal Revenue Service do not meet the requirements of the Domestic Mail Manual [Section D042.1.7], Postal Operations Manual [Section 822.11], and Headquarters Directives. [d] Please confirm, or explain if you are not able to do so, that customers who purchased the referenced Return Receipt service did not receive the service that they paid for.

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 21, 2000





September 24, 1999

Mr. David B. Popkin
P. O. Box 528
Englewood, NJ 07631-0528

Dear Mr. Popkin:

In response to your recent inquiry, each year and right up until April 15, the Internal Revenue Service (IRS) and Georgia Income Tax Division receive millions of tax returns, many of which are sent by mailers who want a return receipt. Because of the sheer volume, we record each item on computerized lists, and deliver them in bulk to the IRS and the Georgia Income Tax Division.

When the mail is turned over to the respective government agency, their employees verify the numbers for each individual item against the numbers on the computerized list. The agencies employees then sign the list verifying delivery and distribute the mail within their office. At this point they will also sign and date-stamp each return receipt and return it to the mailstream.

It has been our experience that most mailers receive their return receipts in a reasonable amount of time. However, sometimes the agencies' employees fail to properly complete and return the receipts. We regret such oversights and realize the inconvenience and worry it can cause our customers.

Through our "duplicate" return receipt service, *Form 3811A*, your post office can request delivery information on the mail in question with the respective agency. They will research their computerized lists and provide you with a duplicate return receipt. Such duplicate return receipts are accepted by the courts and other authorities as proof that the article was delivered.

Sincerely,

A handwritten signature in cursive script that reads "Jan M. Lovell".

Jan Lovell
Manager, Consumer Affairs



September 24, 1999

David B. Popkin
PO Box 528
Englewood, NJ 07631-0528

Dear Mr. Popkin:

This is in response to your inquiry about mail sent via Certified mail addressed to the Internal Revenue Service with a request for a Domestic Return Receipt.

The Internal Revenue Service (IRS) receives millions of tax returns, many of which are sent by mailers who want a return receipt. Because of the large amount of return receipt mail, it is delivered in bulk to the IRS.

Under our procedures for handling return receipt mail addressed to government agencies, the IRS is responsible for signing and returning the receipts directly to the mailer. The empty envelopes are given daily to our postal employee to generate a tracking file for delivery.

I hope this information clarifies this issue. If I can be of further assistance, please let me know.

Sincerely,

A handwritten signature in cursive script that reads "Darlene McCaster".

Darlene McCaster
Consumer Affairs Representative

Enclosure

CONSUMER AFFAIRS AND CLAIMS
PHILADELPHIA DISTRICT



October 26, 1999

Mr. David B. Popkin
Post Office Box 528
Englewood, NJ 07631-0528

Dear Mr. Popkin:

This letter is in response to your recent correspondence concerning our process of handling Certified Mail, Return Receipt Requested (PS Form 3811) for the Internal Revenue Service, Philadelphia, PA.

The Internal Revenue Service (IRS) receives an enormous amount of mail on a daily basis. Certified Mail is delivered to the IRS with PS Form 3811 attached to the mailpiece. The Certified Mail is then scanned by a U.S. Postal Service Representative into our Delivery Confirmation Receipt System (DCRS). After proper completion of this process, it is the responsibility of the IRS to acknowledge receipt by date stamping and returning all PS Form(s) 3811 to the mailer.

In the event the Return Receipt is not returned, the mailer may initiate a Duplicate Return Receipt (PS Form 3811A).

We hope that the information is helpful. Thank you for your inquiry.

Sincerely,

Denise Henry Bolden

Denise Henry Bolden
Acting Manager, Consumer Affairs & Claims

Reference: I35011045



September 28, 1999

Mr David B. Popkin
Post Office Box 528
Englewood, NJ 07631-0528

Dear Mr. Popkin:

Thank you for your letter requesting clarification on our procedure for processing PS Form 3811, Return Receipt on certified mail sent to the Internal Revenue Service.

Each year and right up until April 15, the IRS receives millions of tax returns, many of which are sent by mailers who want a return receipt. Because of this sheer volume, we record each item on computerized lists, and deliver them in bulk to IRS.

When the mail is turned over to the IRS, their employees verify the numbers for each individual item against the numbers on the computerized list. The IRS employees then sign the list verifying delivery and distribute the mail within the IRS office. At this point they also will sign and date-stamp each return receipt and return it back to the mailstream.

It has been our experience that most mailers receive their return receipts in a reasonable amount of time. However, sometimes the IRS employees fail to properly complete and return the receipts. We regret such oversights and realize the inconvenience and worry it can cause our customers.

Through our "duplicate" return receipt service, Form 3811A, your post office can request delivery information on your item with IRS and the delivery post office. Through the computerized record, if IRS has done its part, the computer will know if a specific item was received and signed for by IRS. If confirmed, a Form 3811A with delivery information will be sent to the mailer. If there is no recorded delivery, full postage fee will be refunded.

Sincerely,

A handwritten signature in cursive script that reads "Roberta Buchman".

Roberta Buchman
Manager, Consumer Affairs