

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS KINGSLEY TO INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA
(MPA/USPS-T10-8-20)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of Magazine Publishers of America: MPA/USPS-T10-8-20, filed on March 10, 2000. Interrogatories MPA/USPS-T10-21-23 were redirected to witness Baron.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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March 24, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
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MPA/USPS-T10-8 For each of the years in the period 1987-1999, please provide the following, for each route type (e.g., business curblines, residential park & loop):

- (a) The year-end total number of city routes.
- (b) The number of city carrier hours that were spent as in-office and out-of-office time.
- (c) The year-end total number of city carriers.

Response:

- a. Data on the number of city routes by type is fragmentary prior to 1995. Among these earlier years, data is available for FY 90 and FY 92 only, and the classification of routes is different for FY 90. In FY 90 the counts were: Foot – 22,386; Park & Loop – 102,330; Business Motorized – 2,479; Curblines – 30,470. The counts for FY92 and FY 95 – FY 99 are shown in the table below. A breakdown on the basis of residential or business is not available.

Year	Foot	Park&Loop	Curblines	Dismount	Other
FY 92	38,730	71,889	34,750	12,848	3,296
FY 95	21,272	90,829	36,002	18,068	2,555
FY 96	20,352	90,041	36,693	18,818	1,868
FY 97	17,495	88,349	37,126	20,892	1,753
FY 98	15,434	87,767	38,679	22,623	1,438
FY 99	14,398	89,258	38,838	23,359	1,070

- b. – c. I am told that this data is not available by type of route.

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MPA/USPS-T10-9 For each of the years in the period 1987-1999, please provide the year-end number of delivery units (e.g., offices, stations, branches) which serve city carrier routes.

Response:

I am told that the number of city delivery units is not available.

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MPA/USPS-T10-10 What proportion of city carrier routes were restructured (redesigned) during each of the years in the period 1987-1999? If possible, please provide this information separately for each route type.

Response:

I am told that the number of city delivery routes that were restructured is not available at the national level.

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MPA/USPS-T10-11 On pages 26-27, you state that "DPS reduces office time by saving each carrier up to 1 1/2 hours a day for casing letters. This time was captured by reducing overtime or assistance that had been provided the carrier."

- (a) Please provide all documentation for the 1 1/2 hour estimate,
- (b) For what time period has this savings been estimated?
- (c) For the time period in (b), please quantify the savings in terms of system-wide office time savings caused by DPS.
- (d) For the time period in (b), please quantify the increase in system-wide out-of-office time caused by DPS.
- (e) Please explain how this relates to the additional 25 minutes on the street that has been incurred since FY88.

Response:

a. – b. See NAA/USPS-T10-1

c. As reported by the General Accounting Office in April 1998, the Postal Service projected that DPS would cumulatively save 27.2 million city and rural carrier workhours during the period FY 94 to FY 97. Actual reductions of carrier office workhours for this period were 22.5 million. I am told that, using the GAO methodology, Postal Service savings from the DPS program were 6.5 million city and rural workhours in FY 98.

d. Street time has increased since 1992 for a variety of reasons. I am told that the portion of the increase that might be due to DPS is undetermined.

e. See NAA/USPS-T10-5 for an explanation of the 25 minutes. The relation between time saved in the office and time incurred on the street is undetermined.

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MPA/USPS-T10-12 Was "auxiliary assistance," as the term is used on page 27 of your testimony, included in city carrier out-of-office time during the period 1994-1999? If not, please identify the cost component in which it was included.

Response:

Yes, in my testimony the term refers to assistance outside the office, and I am told that workhours incurred by that assistance are included in street time. However, to be complete, note that the carrier providing auxiliary assistance may, on occasion, assist the carrier in casing a portion of the route. When that occurs, the time is charged to office time.

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MPA/USPS-T10-13 Was "router time," as the term is used on page 27 of your testimony, included in city carrier in-office time during the period 1994-1999? If not, please identify the cost component in which it was included.

Response:

Yes, I am told that they were included.

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MPA/USPS-T10-14 On page 27, you state that DPS and the resultant route restructuring has 'eliminated 3,200 routes outright nationwide, and avoided approximately 3,000 to 4,000 new routes that would have otherwise been created due to the growing number of delivery points.'

- (a) Over what time period has this route restructuring taken place?
- (b) For what time period has this savings in number of routes occurred?
- (c) Please provide all documentation available to demonstrate that 3,200 routes have been eliminated and 3,000-4,000 new routes have been avoided.

Response:

- a. Route restructuring began with the implementation of DPS in March, 1993, and continues to the current time.
- b. The savings were calculated over the period FY 94 to FY 98.
- c. According to the GAO audit of DPS, page 21, "city carrier routes increased 267 in fiscal year 1995 and decreased in fiscal years 1996 and 1997 by 858 and 2,561, respectively". They decreased by another 24 routes in FY 98, yielding a net decrease of 3,176 routes for FY 94 to FY 98. I am told that, during the period FY 95 to FY 98, about 1.5 million delivery points were added to the postal network. Evaluated at the FY 95 average of 478 delivery points per city street route, this equates to 3,138 routes that would have otherwise been required.

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MPA/USPS-T10-15 Please provide any estimates you may have as to the volumes of DPS and non-DPS letters that are delivered by city delivery carriers.

Response:

I am told that the following estimates are based on all city carriers:

	Cased Letters	DPS Letters
1997	64 Billion	37.3 Billion
1998	57.9 Billion	44 Billion
1999	54.3 Billion	50 Billion

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MPA/USPS-T10-16 On page 27, you state that "some older developments" have been converted to cluster boxes.

(a) Please provide all documentation as to how that has been achieved and the time period over which it was achieved.

(b) Please quantify the number of conversions (in terms of delivery points, if possible) for the time period in (a).

(c) If the same is true for other types of delivery (e.g., curblines), please identify that and provide all documentation as to how that was also achieved and the time period over which it was achieved.

(d) If the same is true for other types of delivery, please quantify the number of conversions for the time period in (c).

Response:

a. Any delivery can be converted to a more efficient and economical delivery as long as the customer approves the change. See the attached two pages from the Postal Operations Manual, section 631.6 which defines the criteria for conversions.

b. No data is kept on the number of conversions made.

c. See (a) above

d. See (b) above

double rooms with connecting bath) and separate centrally located facilities for dining and receiving visitors. Whether located on or off campus and regardless of private ownership, such buildings are nevertheless dormitories and either the school or building owner is responsible for final delivery of student mail. Post office personnel are not to distribute mail into apartment-type mailboxes.

631.53 **Married Student Housing**

Apartments and housing units for married students ordinarily are complete quarters consisting of a living room, kitchen-dinette, bedroom, and bath. Whether located on or off campus and regardless of ownership, the apartment mail receptacle requirements in 631.45 apply.

631.54 **Fraternity and Sorority Buildings**

Deliver mail in bulk to a common mailbox or to a representative of the organization if addressed to a specific building.

631.55 **Parcel Post**

Deliver parcel post in the same manner as other ordinary mail matter.

631.56 **Special Delivery**

Provide special delivery service to buildings in the same general manner and to a like degree as other delivery service. Include buildings that are authorized to receive regular bulk mailings on special delivery runs. Once the messenger arrives at the delivery address, however, handle the article in the same fashion as other mail.

631.57 **Forwarding of Mail**

Forwarding mail for former students and for current students during the summer and vacation periods is the responsibility of the institution or building owner, except where delivery to individual apartment receptacles for married student housing is being provided. Encourage school officials to include mail forwarding, proper mail addressing, and other related postal features in general instructions to students.

631.58 **Noncity Delivery Offices**

Where city delivery service is not established, students may rent post office boxes or use general delivery, or the institution may arrange to pick up the mail in bulk and make its own distribution and delivery.

631.6 **Conversion of Mode of Delivery**

In this section, *conversion* refers to changing existing mail delivery to a more economical and efficient mode. The key to converting existing deliveries is identifying those deliveries that are most costly to the Postal Service. Delivery managers can go into any delivery territory where delivery has been established for over 1 year and solicit to convert the mode of delivery if it would be cost beneficial to the Postal Service.

Postmasters should not establish a mixed delivery area where the carrier must zigzag from the door to the curb when previously the carrier took obvious shortcuts to effect delivery. Postmasters must weigh the advantages and disadvantages of converting less than 100 percent of the deliveries.

Customer signatures must be obtained prior to any conversion. In single-family housing areas (including manufactured housing and mobile homes) where the residences and lots are owned, each owner must agree to the conversion in writing. Owners who do not agree must be allowed to retain their current mode of delivery.

When a residence is sold, the mode of delivery cannot be arbitrarily changed prior to the new resident moving in. The existing mode of delivery must be retained. If an owners' association represents the community, it can direct the mode of delivery for the community. In rental areas, such as apartment complexes and mobile home parks, the owner or manager can approve the conversion.

631.7 **Correction of Improper Mode of Delivery**

In the event an improper mode of delivery is extended by a postal carrier or manager, the service will be withdrawn provided that the error is detected within 90 days. If the error is not detected within 90 days, the service will remain in place.

631.8 **Military Installations**

631.81 **Family Housing**

Delivery to family housing on military installations is effected in accordance with 611, 64, 65, or 66, whichever is appropriate.

631.82 **Other Services — Agreement With the Military**

Other services are provided to military installations in accordance with Publication 38, *Postal Agreement with the Department of Defense*, signed on February 22, 1980, reprinted in pertinent part:

III. POLICY

- A. The Military Postal Service is operated as an extension of the United States Postal Service as authorized by 39 U.S.C. 406.
- B. The Department of Defense and the Postal Service agree to attempt to furnish mail service to the military equal to that provided the civilian population in the United States.
- C. The Department of Defense and the Postal Service affirm the importance of the national goal of energy conservation, and both parties resolve to minimize energy expenditure while conducting military postal operations.

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MPA/USPS-T10-17 On page 27, you state that 'DPS implementation allowed for additional handling costs on DPS letters, calculated as one hour per 5000 pieces of DPS.'

- (a) Please provide all documentation for that productivity figure.
- (b) Please provide the Decision Analysis Report mentioned in footnote 10 on page 27 and please explain why you believe it is "conservative".
- (c) Please provide all documentation quantifying or discussing the effect of DPS volume on out-of-office time.
- (d) Please explain fully what you mean by "residual handling" as used in Footnote 10 on page 27.
- (e) Is the following considered out-of-office time: when carriers go to a rack to pick up their trays of DPS, verify that it is their mail and that it is in accurate walk sequence? Please explain.

Response:

- a. I am told that the productivity figure was an assumption in the Decision Analysis Report.
- b. The DAR mentioned in footnote 10 is being provided under protective conditions in response to ANM/USPS-T9-23(a). Footnote 10 annotates the additional handling assumption, "one hour per 5000 pieces of DPS". This assumption, covering potential tasks that might be largely nonexistent, illustrates what I consider a "conservative" approach common to engineering DARs.
- c. There is no data that would specifically quantify the effect of DPS volume on street time.
- d. Prior to DPS implementation, the amount of additional handling required to prepare DPS mail (as an addition to the time required for cased mail) was uncertain. However, there was a realization that some incidental handling of this mail would

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occur, and the potential savings that delivery units were expected to capture were reduced accordingly. Some examples of residual handling include riffling through trays as a quality check ensuring that DPS mail in the tray does belong to the carrier route number, and pulling out mail to honor a hold request or change of address notice.

e. It could be either, warranted by local conditions. If the DPS mail is stored at the back dock and the carrier does not verify this mail until performing the loading function, it would be street time. If the DPS mail is stored more centrally, the carrier will normally verify the DPS trays, place the trays with other mail and then proceed to perform the loading function. In this case, the activity would be considered an office function. Foot carriers need to prepare relays, and consequently, verify and separate their DPS mail in the office.

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MPA/USPS-T10-18 On page 27, you state that: "there were 5.6 pieces per delivery in FY98 compared to only 5.1 in FY88."

(a) Please provide all documentation and calculations to support those figures.

(b) Please identify the type of delivery(ies) described in this statement (e.g., SDR, MDR, B&M).

(c) For both averages (5.6 and 5.1), please provide the breakdown in terms of non-DPS letters, DPS letters, flats, parcels, and accountables.

Response:

a. See NAA/USPS-T10-4.

b. I do not understand your question. If you mean the distribution of route types, see MPA/USPS-T10-8 for FY 98. I am told that the corresponding data for FY 88 is not available.

c. I am told that this data is not available. However, I did find a limited study of 202 routes performed in 1997. Using data from route inspections, the study calculated that the average route on an average day had 1,069 cased letters, 798 flats, and 995 DPS letters.

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MPA/USPS-T10-19 With respect to your statement on page 28 that: comparing FY88 to FY98 , , , today's city carriers average an additional 25 minutes on the street delivery 8 percent more mail to 2 percent fewer delivery points, most of which are centralized or on curblines routes, , " please provide the following:

(a) All documentation, assumptions, and calculations supporting your statement.

(b) A clear explanation and quantification of how much of the additional 25 minutes is caused by DPS rather than additional volume.

(c) A clear explanation and quantification of how much of the additional 25 minutes is caused by increases in deliveries that require direct interaction with the recipient, such as those for large parcels, multiple parcels, and accountables.

(d) A clear explanation and quantification of how much of the additional 25 minutes is caused by increases in the fixed time to access centralized delivery locations (e.g., contained in locked/gated communities, large high-rises, industrial parks, etc.) and open locked central delivery boxes.

Response:

a. See NAA/USPS-T10-5 and MPA/USPS-T10-8.

b. - d. I am told that information necessary for the requested computations is unknown.

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MPA/USPS-T10-20 Over the past twelve years, what has been the USPS policy with respect to:

- (a) The size, shape, or placement of new delivery receptacles?
- (b) The replacement or relocation of older receptacles?
- (c) The adequacy of streets and roads over which a city carrier must travel to deliver his route?

Response:

- a. The size, shape and placement of mail receptacles are determined by the method of delivery being extended. See the attached excerpts from the Postal Operations Manual that defines the criteria for establishment and extension of delivery, and mailbox design and placement requirements.
- b. Customers are required to provide appropriate and adequately sized mailboxes to ensure the safety of the carrier and to accommodate the customer's average daily volume. If the customer fails to meet these criteria, delivery can be withdrawn until the appropriate mail receptacle is provided. Local postmasters have the authority to withdraw delivery under these circumstances. (POM 623.1,623.21,632.14, 632.53, 632.63)
- c. POM 641.2 defines the requirements for establishment and extension of delivery. The criterion is that the streets are paved or otherwise improved to permit the travel of Postal Service vehicles at all times, without damage or delay.

63 Modes of Delivery, Mail Receptacles, and Keys

631 Modes of Delivery

631.1 General

For all establishments and extensions, the options for delivery service are to the door, curblines, or central delivery points or receptacles, supplemented as given below.

631.2 Business Areas

The type and design of buildings govern the mode of delivery to be implemented. The options are as follows:

- a. *Central Delivery.* Central delivery service is for business office buildings, which may include call windows, horizontal locked mail receptacles, cluster box units (CBUs), neighborhood delivery and collection box units (NDCBUs), or mechanical conveyors (only for high-rise, multiple-tenant buildings, and only if certain conditions are met; consult postmaster for details).
- b. *Single Point Delivery.* Single point delivery is for single points, receptacles, or door slots provided by business management. If there is an elevator and if the offices are open to receive mail, or if door slots are provided, delivery is authorized to all floors of office buildings. If there is no elevator, delivery is provided to the first floor, and to the second floor if it is occupied primarily by business offices and if the service is requested.

631.3 Residential Housing (Except Apartment Houses and Transient Mobile or Trailer Homes)

631.31 General

For all residential areas, except apartment houses, transient mobile or trailer homes, colleges and universities, and other sites covered under 615, the delivery options, under the regulations given below, are curbside, sidewalk, or central delivery.

631.32 Curbside Delivery

Delivery may be provided to boxes at the curb so they can be safely and conveniently served by the carrier from the carrier's vehicle, and so that customers have reasonable and safe access. Mail receptacles may be grouped, two to a property line where possible.

631.33 Sidewalk Delivery

Options and requirements for sidewalk delivery are as follows:

- a. If the sidewalk abuts the curb or if other unusual conditions exist (e.g., excessive street parking) that make it difficult or impractical to install or serve boxes at the curblines, those customers may be permitted to

install all their boxes at the edge of the sidewalk nearest the residence, where they can all be served by the carrier from the sidewalk.

- b. If the average lot frontage is 75 feet or less, the boxes are not required to be grouped together; if the average lot frontage exceeds 75 feet, the boxes must be installed in groups of at least two.
- c. If the average lot frontage is 50 feet or less, customers may locate their mailboxes at the edge of the sidewalk nearest the residence rather than at the curb, regardless of whether the sidewalk abuts the curb or other unusual conditions exist. All the boxes must be located so that the carrier can serve them from the sidewalk.

631.4 **Exceptions**

631.41 **Extension of Service Within an Existing Block**

New homes or businesses built within a block of existing homes or businesses receive the same type of service as the older homes or businesses. When new development replaces more than one block, delivery methods must comply with mode of delivery options for establishment and extension of delivery service.

631.42 **Hardship Cases**

Procedures and guidelines for changes in delivery in hardship cases are as follows:

- a. Changes in the mode of delivery authorized for a delivery point are considered where service by existing methods would impose an extreme physical hardship on an individual customer. Any request for a change in delivery mode must be submitted in writing.
- b. Approval of these requests should be based on humanitarian and not economic criteria; however, rural delivery customers requesting a hardship extension must also meet current criteria for extension of rural delivery service (see 653). Each request for a change in delivery service should be evaluated based on the customer's needs; a request should not be denied solely because of increased operational costs or because a family member or other party may be available to receive mail for the customer.
- c. If the local postmaster denies a request, the request must be sent to the district for review. The final decision is made by the district manager.
- d. If a customer no longer requires a variation in the type of delivery service, mail service must be restored to the mode of delivery in effect in the area.

631.43 Local Ordinances

If a customer chooses not to erect a curbside box because of a local, city, county, or state ordinance prohibiting the installation of mailboxes at the curb, the delivery options in establishments and extensions are as follows:

- a. *Central Delivery Service.* See 631.44.
- b. *Post Office Box or General Delivery Service.* Post office box or general delivery service may be provided at the nearest postal facility where carrier delivery emanates.

631.44 Central Delivery**631.441 Delivery Requirements**

NDCBUs or CBUs may be approved for use at one or more central delivery points in a residential housing community. The local postal manager must approve the mailbox sites and type of equipment. Boxes must be safely located so that customers are not required to travel an unreasonable distance to obtain their mail. Normally, within one block of the residence is appropriate.

631.442 Central Delivery Addresses

Central delivery mail receptacles (including NDCBUs and CBUs, delivery centers, and postal centers) must be identified by the same addresses as the dwellings for which they serve as mail receptacles. These identical individual addresses should be placed inside the boxes to be visible only to the carrier as he or she serves the receptacle or the customer. For security or privacy, mailer associations or customer groups may use another alphanumeric identification system on the outside of the receptacle that is not part of, or used in, the mailing address.

631.45 Apartment Houses**631.451 General**

Delivery of mail to individual boxes in a residential building containing apartments or units occupied by different addressees (regardless of whether the building is an apartment house, a family hotel, residential units, or business units in a residential area and regardless of whether the apartments or units are owned or rented) is contingent on the following:

- a. The building contains three or more units (above, below, or behind; not side by side) with:
 - (1) A common building entrance such as a door, a passageway, or stairs;
 - (2) A common street address (some part of the address is shared) approved by local or municipal authorities.
- b. The installation and maintenance of mail receptacles is approved by the USPS.
- c. Each apartment is provided one box, including that of any resident manager or janitor, unless the management has arranged for mail to be delivered at the office or desk for distribution by its employees.

- d. The grouping of the boxes for the building is at a single point readily accessible to the carrier.

Note: The tenant's correct mailing address is the address of the entrance at which the mail receptacles are located, and should include the apartment number or designated mailbox number.

631.452 **Exceptions**

Exceptions to the above requirements are as follows:

- a. If more than one such building in an apartment house complex has the same approved common street number, delivery of mail to individual boxes is contingent on the grouping of all the boxes for the common street number at a single point readily accessible to the carrier, even though the boxes serve residents in more than one building.
- b. If such a building has more than one entrance, delivery of mail to receptacles grouped at more than one entrance is contingent on each entrance to which delivery is made serving three or more apartments or flats and the assignment, by local or municipal authorities, of a different street number to each such entrance.
- c. When new apartments are being erected or existing ones remodeled, postmasters will inform builders and owners of the requirements of these regulations and will provide a suitable inspection to ensure that safe and durable receptacles are installed in conformance with these regulations. Postal Service-approved parcel lockers may be used with approved mail receptacles.

631.46 **Mobile or Trailer Homes**

631.461 **Options**

The delivery options for mobile or trailer home developments depend on whether the development is permanent or transient.

631.462 **Permanent Developments**

Permanent developments consist of managed mobile home parks or residential mobile home subdivisions where the lots are permanently assigned, the streets are maintained for public use, and the conditions are similar to those of a residential subdivision. For permanent developments, the delivery options are either curbside, sidewalk, or central delivery, under the regulations below.

- a. *Curbside Delivery.* Delivery service may be provided to boxes at the curb so that they can be safely and conveniently served by the carrier from the vehicle.
- b. *Sidewalk Delivery*
 - (1) If the sidewalk abuts the curb or other unusual conditions exist (e.g., excessive street parking) that make it difficult or impractical to install or serve boxes at the curblines, those customers may install all their boxes at the edge of the sidewalk nearest the residence where they can all be served by the carrier from the sidewalk.

- (2) In such conditions, if the average lot frontage is 75 feet or less, the sidewalk boxes are not required to be grouped together; if the average lot frontage exceeds 75 feet, the sidewalk boxes must be installed in groups of at least two.
- (3) If the average lot frontage is 50 feet or less, customers may be permitted to locate all their mailboxes at the edge of the sidewalk nearest the residence rather than at the curb, regardless of whether the sidewalk abuts the curb or other unusual conditions exist. All the boxes must be located so the carrier can serve them from the sidewalk.

c. *Central Delivery*

- (1) Delivery service may be provided to a single point or receptacle designated by the management of the development for the receipt of mail for distribution by its employees.
- (2) Delivery service may be provided to one or more central points for the direct receipt of mail by postal customers within the area. The requirements for such central delivery are as follows:
 - (a) The local USPS managers must approve the mailbox sites and equipment.
 - (b) Customers must not be required to travel an unreasonable distance to obtain their mail.

631.463 **Transient Developments**

Transient developments are mobile home, trailer, and recreational vehicle parks where the lots are temporarily occupied or rented and considered transient or seasonal, even though some families may live in them for an extended period. For these developments, the only option is delivery to a single point or receptacle designated by park management and approved by local USPS managers for the receipt of mail for distribution and mail forwarding by employees of the park. This method is one of the service options for permanent developments.

631.5 **Colleges and Universities**

631.51 **Administration Buildings**

Mail is delivered to principal administration buildings. Mail undeliverable as addressed or not addressed to a specific building is delivered to the main administration building office for further handling. At larger universities, deliver to the different departments, colleges, faculty buildings, and principal campus structures, such as the Chemistry Building, Engineering Building, and so forth, provided that mail is thus addressed and the volume warrants. Delivery is not to be made to individual administration offices.

631.52 **Dormitories or Residence Halls**

Mail is delivered to dormitory buildings and residence halls when addressed to a specific building. Deliver mail in bulk to a designated representative of the school, who then is responsible for further distribution to students. A dormitory building or residence hall ordinarily consists of single-room units (or

double rooms with connecting bath) and separate centrally located facilities for dining and receiving visitors. Whether located on or off campus and regardless of private ownership, such buildings are nevertheless dormitories and either the school or building owner is responsible for final delivery of student mail. Post office personnel are not to distribute mail into apartment-type mailboxes.

631.53 **Married Student Housing**

Apartments and housing units for married students ordinarily are complete quarters consisting of a living room, kitchen-dinette, bedroom, and bath. Whether located on or off campus and regardless of ownership, the apartment mail receptacle requirements in 631.45 apply.

631.54 **Fraternity and Sorority Buildings**

Deliver mail in bulk to a common mailbox or to a representative of the organization if addressed to a specific building.

631.55 **Parcel Post**

Deliver parcel post in the same manner as other ordinary mail matter.

631.56 **Special Delivery**

Provide special delivery service to buildings in the same general manner and to a like degree as other delivery service. Include buildings that are authorized to receive regular bulk mailings on special delivery runs. Once the messenger arrives at the delivery address, however, handle the article in the same fashion as other mail.

631.57 **Forwarding of Mail**

Forwarding mail for former students and for current students during the summer and vacation periods is the responsibility of the institution or building owner, except where delivery to individual apartment receptacles for married student housing is being provided. Encourage school officials to include mail forwarding, proper mail addressing, and other related postal features in general instructions to students.

631.58 **Noncity Delivery Offices**

Where city delivery service is not established, students may rent post office boxes or use general delivery, or the institution may arrange to pick up the mail in bulk and make its own distribution and delivery.

631.6 **Conversion of Mode of Delivery**

In this section, *conversion* refers to changing existing mail delivery to a more economical and efficient mode. The key to converting existing deliveries is identifying those deliveries that are most costly to the Postal Service. Delivery managers can go into any delivery territory where delivery has been established for over 1 year and solicit to convert the mode of delivery if it would be cost beneficial to the Postal Service.

exclusively under the SAM/PAL law without prior consultation with the other party. Committee meetings may be held upon written request of either party. Following such consultation, a joint committee report may be prepared for transmission to the respective managements.

- C. Nothing herein is intended to provide for the joint administration of any activity whose administration is not provided for by 39 U.S.C. 3401 (f)(1976).
- D. This section supersedes the supplementary agreement dated September 30, 1976, concerning "Joint Administration of Title 39, United States Code, Section 3401 (the SAM/PAL Law) by the United States Postal Service and the Department of Defense."

631.83 **Reference**

See Publication 38-A, *Guidelines for Providing Postal Services on a Military Installation*, for details on providing delivery, collection, and retail services.

632 **Mail Receptacles**

632.1 **Customer Obligation**

632.11 **Responsibilities**

Appropriate mail receptacles must be provided for the receipt of mail. The type of mail receptacle depends on the mode of delivery in place. Purchase, installation, and maintenance of mail receptacles is the responsibility of the customer. Appropriate locations for installation should be verified with local government officials. Customer obligations are as follows:

- a. If door delivery is authorized, customers must provide either house-mounted boxes that provide adequate protection and security for the mail and that are approved by the local postmaster, or they must provide door slots (see 632.3).
- b. If curblines delivery is authorized, customers must erect curb-mounted receptacles that comply with USPS STD-7 (see 632.5).
- c. If centralized delivery is authorized, customers must install mail receptacles that comply with USPS STD-4B (RDD), *Apartment House Mail Receptacles*, or USPS STD-1118, *Cluster Box Units or Neighborhood Delivery and Collection Box Units* (see 632.6).

632.12 **Exception**

The Postal Service may elect, under certain conditions, to purchase, install, or maintain curb or cluster box units.

632.13 **Receptacles Not Required**

Business houses are not required to provide mail receptacles or door slots if they are open and someone is on hand to receive the mail when the carrier arrives. If the offices are not open when the carrier arrives, mail receptacles or door slots must be provided.

632.14 **Approach to Mailbox**

The customer is responsible for keeping the approach to his or her mailbox clear to facilitate delivery. Where the approach to the mail receptacle located at the curb is temporarily blocked by a parked vehicle during normal delivery hours for the area, or snow or ice hampers the approach to the mailbox, the carrier normally dismounts to make delivery. If the carrier continually experiences a problem in serving curbside boxes and where the customer is able to control on-street parking in front of his or her mailbox but does not take prompt corrective action after being properly notified, the postmaster may, with the approval of the district manager, withdraw delivery service.

632.2 **Keys to Customer's Private Mail Receptacle**

Carriers are prohibited from accepting keys for locks on private mail receptacles, buildings, or offices, except where an electromechanical door lock system or a key returning box located within convenient reach of the door is used. Both devices must incorporate an Arrow lock to access the key or device needed to gain entry to the building. If customers place locks on their receptacles, the receptacles must have slots large enough to accommodate their normal daily mail volume so that delivery may be made by the carrier without using a key.

632.3 **Door Slot Specifications**

The clear rectangular opening in the outside slot plate must be at least 1½ inches wide and 7 inches long. The slot must have a flap, hinged at the top if placed horizontally or hinged on the side away from the hinge side of the door if placed vertically. When an inside hood is used to provide greater privacy, the hooded part must not be below the bottom line of the slot in the outside plate if placed horizontally or beyond the side line of the slot in the outside plate nearest the hinge edge of the door if placed vertically. The hood at its greatest projection must not be less than 2¹/₁₆ inches beyond the inside face of the door. Door slots must be placed no less than 30 inches above the finished floor line.

632.4 **Receptacles Purchased by USPS**

Neighborhood delivery and collection box units and parcel lockers may be purchased by the USPS from approved manufacturers. Specifications for construction and approval procedures for manufacturers are covered in USPS-1118D, *USPS Specification, Cluster Box Units*. Individuals or firms interested in the manufacture of cluster units should write to:

OFFICE OF TECHNICAL SUPPORT
US POSTAL SERVICE
475 L'ENFANT PLAZA SW
WASHINGTON DC 20260-6203

632.5 **Curbside Mailboxes**

632.51 **Specifications for Manufacturers**

632.511 **Policy**

Manufacturers of all mailboxes designed and manufactured to be erected at the edge of a roadway or curbside of a street and to be served by a carrier from a vehicle on any city, rural, or highway contract route must obtain approval of their products according to USPS STD-7, *Mailboxes, City and Rural Curbside*. Construction standards and drawings (USPS STD-7) for guidance in the manufacture of curbside mailboxes may be obtained by writing to:

DELIVERY & CUSTOMER SVCS EQUIPMENT
 US POSTAL SERVICE
 8403 LEE HWY
 MERRIFIELD VA 22082-8101

632.512 **Dimensions and Styles**

The permitted sizes and styles for mailboxes are as follows:

- a. *Sizes and Styles.* Three standard sizes and two styles of mailboxes are approved for use on city, rural, and highway contract routes:

Style/Size	Length ¹	Width ¹	Height ¹
T1 and C1 ²	18½	5	6
T2 and C2	19½	6	7
T3 and C3	22½	8	11½

¹ Dimensions in approximate inches.

² T=traditional style; C=contemporary style.

- b. *Variances.* Curbside mailboxes may be constructed in any size between the maximum and minimum outside dimensions specified on approved drawings if the general shape and the proportions of height, width, and length are maintained.

632.513 **Application for Approval**

Manufacturers must notify USPS Delivery and Customer Services Equipment by letter that mailboxes are being submitted for approval. To secure approval of a curbside mailbox, manufacturers must submit the following to Delivery and Customer Services Equipment at this address:

DELIVERY & CUSTOMER SVCS EQUIPMENT
 US POSTAL SERVICE
 8403 LEE HWY
 MERRIFIELD VA 22082-8101

- a. *Sample Mailboxes.* No fewer than two complete mailboxes with markings required in paragraph 3.7 of USPS STD-7 of each style made of exact materials, construction, coating, paint, and so forth, including the panels required by paragraph 3.14.8 of USPS STD-7, and otherwise identical in every way with the boxes intended to be marketed.

- b. *Instructions.* A copy of the instructions required by paragraph 3.11 of USPS STD-7.
- c. *Color Samples.* Color samples showing all color schemes to be used.
- d. *Proposed Packaging.* Boxes or packaging of the type proposed for shipping production units.
- e. *Documentation.* Two complete sets of manufacturing drawings and installation instructions showing that the units submitted meet the requirements of USPS STD-7. The drawings must be dated, signed, and certified to represent the production units exactly as submitted. The drawings must include enough details to allow the USPS to document and inspect all materials, construction methods, processes, coatings, treatments, finishes, control specifications, parts, and assemblies used in the construction of the units. The USPS may request individual piece parts to verify drawings.

632.514 Modifications During Application Process

The manufacturer may not make changes to its products or drawings without written notification of and approval from the USPS. Any changes must be submitted with reasons in writing and documented in the revision block of the affected drawings. Two units of each type with the changes incorporated must be submitted for testing and approval. All changes are subject to written approval by the USPS.

632.515 Application Approval

The following pertain to the approval process:

- a. *Authorizing Organization.* The decision to approve or disapprove mailboxes is issued by Engineering. All correspondence and inquiries must be directed to that office.
- b. *Retention of Drawings and Sample Mailboxes.* The USPS returns one set of manufacturing drawings to the manufacturer, with written notification of approval or disapproval and, if applicable, reasons for disapproval. The drawings are stamped and identified as representing the production unit type if the mailbox is approved. After testing, the USPS keeps approved boxes and disposes of disapproved boxes unless the manufacturer requests their return and pays the shipping costs.

632.516 Production Units

The following guidelines apply to production units:

- a. *Construction.* Manufacturers must construct production units in accordance with identified (stamped) drawings and USPS STD-7. These units must be of the exact materials, construction, coating, workmanship, finish, etc., as the approved units. The USPS reserved the right at any time to examine and retest production units obtained either in the general marketplace or from the manufacturer, and may require the manufacturer to provide units for examination and testing. Failure of these production units to be manufactured in strict accordance with the approved units, the identified drawings, and the provisions of USPS STD-7 may result in the rejection of units and the

- suspension or revocation of the manufacturer's authorization as an approved manufacturer through a decision issued by Engineering.
- b. *Packaging.* Mailboxes and accessories must be packaged in a manner to ensure arrival at destination in satisfactory condition. Boxes must be shipped fully assembled except that protruding parts, such as door latching hardware, mounting adapters, and mounting posts or stands, may be removed if necessary to protect them from damage. Containers and packaging must comply with the National Motor Freight Classification Rule 222, sections 2 and 3. Boxes must be suitably wrapped or protected and packaged in separate containers to prevent damage to painted surfaces by rubbing against other parts or the internal surfaces of the container.
 - c. *Changes.* Manufacturers must receive written approval from the USPS before making any change to the production unit or the identified design drawings. Approval for changes requires resubmission of units for testing and updated drawings for review.

632.517 Marking

All curbside mailboxes must have the following legible inscriptions on the carrier service door: "U.S. MAIL" and "APPROVED BY THE POSTMASTER GENERAL." Manufacturers must mark these inscriptions by embossing on sheet metal, or they must use raised lettering on plastic or engraving on wood or other materials that would not be suitable for embossing. The name and address of the manufacturer and the month and year of manufacture must also be marked on the box. Manufacturers must either emboss this marking on the rear wall or affix a permanent decal on the inside near the front opening of the box.

632.518 List of Approved Manufacturers

Following is a list of manufacturers of traditional and contemporary-style curbside receptacles whose mailboxes are approved by the USPS.

Approved Curbside Mailbox Manufacturers and Models

Sizes for contemporary-style mailboxes are approximate.

AMERICAN MAILBOX CORPORATION

35 CENTURY TRL

HARRISON NY 10528-1717

Model: Large Domed Roof [C2]

ARMOR PLATE MAILBOX INC

PO BOX 1060

STERLING HEIGHTS MI 48311-1060

Model: MB-001-COLOR [C2]

BACOVA GUILD LTD

1 MAIN ST GENERAL DELIVERY

BACOVA VA 24122-9999

Model: #122 [T1]

#128 [T2]

#121 [T3]

BERARDI AND COMPANY
15745 CRABBS BRANCH WAY
ROCKVILLE MD 20855-2634
Model: Designer 474 [C1]

BERKELY PRODUCTS INC
14680 ALONDRA BLVD
LA MIRADA CA 90638-5603
Model: M1000 (aluminum) [n/a]

BRANDON INDUSTRIES INC
1601 W WILMETH RD
MCKINNEY TX 75069-8250
Model: M1 [C2]
M1 [C2]

CLAPPER SUPPLY
8 TERRACE AVE
BINGHAMTON NY 13901-5736
Model: Secured Mailbox [n/a]

CUTLER MANUFACTURING CORPORATION
PO BOX M
EATON PARK FL 33840-1903
Model: Mailmaster [n/a]

FLAMBEAU AIRMOLD CORPORATION
PO BOX 610
ROANOKE RAPIDS NC 27870-0610
Model: Post Max [C1]

FLAMBEAU PRODUCTS CORPORATION
15981 VALPLAST RD
MIDDLEFIELD OH 44062-0097
Model: 6529 [C1]
6530 [C1]
6531 [C1]

FULTON CORPORATION
303 EIGHTH AVE
FULTON IL 61252-1632
Model: T1 [T1]
T2 [T2]

GDM COMPANY
1316-1/2 CLEVELAND RD
SANDUSKY OH 44870-4213
Model: HB1 [C1]
HB2 [C2]
HT2 [C2]
HB3 [C3]

GER-IVA BERRY COMPANY
1400 INDUSTRIAL AVE
HIAWATHA IA 52233-1159
Model: Secure Mailbox [n/a]

HECHT HOME PRODUCTS
7804 HAYMARKET LN
RALEIGH NC 27615-5441
Model: Double Door Rural Delivery [C1]

HOME IMPRESSIONS
1923 TATE BLVD SW
HICKORY NC 28602-1430
Model: PostMaster [C1]

IMPERIAL MAIL BOX SYSTEMS INC
3901 NORRIS DR
MILLBROOK AL 36054-2433
Model: Style 001 [C2]

JANZER CORPORATION
6 LINCOLN CTR
HULMEVILLE PA 19047-5876
Model: Stony Brae [C2]

J & J MAILBOX
20594 OTTAWA RD
APPLE VALLEY CA 92308-6253
Model: Letter Locker [n a]

JAMESTOWN ADVANCED PRODUCTS INC
2855 GIRTS RD
JAMESTOWN NY 14701-9666
Model: 23 [C1]
27 [C1]
29 [C2]
44 [C1]
49 [C1]
54 [C2]
56 [C2]
86 [C2]

LEIGH A HARROW COMPANY
411 64TH AVE
COOPERSVILLE MI 49404-1234
Model: Parkway 4064 & 4066 [C1]
Hilltop 4053, 4054, & 4055 [C1]
Lampighter 4150 & 4156 [C1]

MB CLASSICS
909 CENTENNIAL RD
NARBETH PA 19072-1407
Model: Contemporary Style [C1]

MR TWO-DOOR MAILBOX INC
9750 PAGE RD
STREETSBORO OH 44241-5014
Model: Two Door [C2]
Boxglow [C2]

NORTHWEST METAL PRODUCTS

PO BOX 10

KENT WA 98035-0010

Model: Traditional #1 [T1]

RUBBERMAID

1147 AKRON RD

WOOSTER OH 44691-6000

Model: 7271 Econo Mailbox [C1]

7272 Small [C1]

7273 Large [C2]

SHELLTER INC

PO BOX 30011

INDIANAPOLIS IN 46230-0011

Model: Rural Mailbox Size 1 [C1]

THE SOLAR GROUP

PO BOX 525

TAYLORSVILLE MS 39168-0525

Model: CC-1R (uses ST-10) [C1]

CC-2R (uses ST-10) [C1]

LP-12 [C1]

PL-10 [C1]

RB-15 [C2]

ST-10 Aluminum [T1]

ST-10 [T1]

ST-15 [T2]

ST-20 [T3]

BB2D [C2]

STEEL CITY CORPORATION

190 N MERIDIAN RD

YOUNGSTOWN OH 44501-1227

Model: CA-1B Carlyle [C1]

LE-1B Brute [C1]

PX-1 Polybox [C1]

1-1 [T1]

1-1 1/2 [T2]

2-2 [T3]

315B Streamliner [C1]

2D-1 Two-Door Brute [C1]

STEP 2 CORPORATION

10010 AURORA-HUDSON RD

STREETSBORO OH 44241-1621

Model: 5401 [C1]

5402 [C1]

5403 [C2]

THREE 60 CORPORATION

10823 PLAZA DR

WHITMORE LAKE MI 48189-9737

Model: Classic Combo

TRAIL SIDE MAILBOX INC
2100 E 32ND PKY
AURORA CO 80011-8148
Model: 1012M [n/a]
1013M [n/a]

VEEDERS MAILBOX INCORPORATED
PO BOX 42048
CINCINNATI OH 45242-0048
Model: SmVMB-W & SmVMB-B [C1]
LgVMB-W & LgVMB-B [C2]
SmVMB-G & SmVMB-T [C1]
LgVMB-G & LgVMB-T [C2]
SmVMB-SS [C1]
LgVMB-SS [C2]

ZUBIEL RF SYSTEMS INCORPORATED
PO BOX 1184
MONUMENT CO 80132-1184
Model: 201, MailCall [C1]

1 — Curbside Box Size No. 1
2 — Curbside Box Size No. 2
3 — Curbside Box Size No. 3
T — Traditional Curbside Box Style
C — Contemporary Curbside Box Style

632.52 **Installation and Use**

632.521 **Custom-Built Curbside Mailboxes**

Postmasters are authorized to approve curbside mailboxes constructed by individuals who, for aesthetic or other reasons, do not want to use an approved manufactured box. The custom-built box must conform generally to the same requirements as approved manufactured boxes relative to the flag, size, strength, and quality of construction.

632.522 **Painting and Identification**

The USPS prefers that curbside mailboxes and posts or supports be painted white, although other colors may be used. Where box numbers are used, the numbers must be inscribed in contrasting color in neat letters and numerals not less than 1 inch high on the side of the box visible to the carrier's regular approach, or on the door if boxes are grouped. Where street names and house numbers are assigned by local authorities and the postmaster has authorized use of a street name and house number as a postal address, the house number must be shown on the box. If the box is on a different street from the customer's residence, the street name and house number must be inscribed on the box. Placement of the owner's name on the box is optional. Advertising on boxes or supports is prohibited.

632.523 **Posts and Supports**

Posts or other supports for curbside mailboxes must be neat and of adequate strength and size. They may not be designed to represent effigies or caricatures that tend to disparage or ridicule any person. The box may be attached to a fixed or movable arm.

632.524 Location

Curbside mailboxes must be placed so that they may be safely and conveniently served by carriers without leaving their conveyances. They must be reasonably and safely accessed by customers. Boxes must also be on the right-hand side of the road and in the carrier's direction of travel in all cases where driving on the left-hand side of the road to reach the boxes would pose a traffic hazard or violate traffic laws and regulations. On new rural or highway contract routes, all boxes must be on the right side of the road in the carrier's direction of travel. Boxes must be placed to conform to state laws and highway regulations. Carriers are subject to the same traffic laws and regulations as are other motorists. Customers must remove obstructions, including vehicles, trash cans, and snow, that make delivery difficult. Generally, customers should install boxes with the bottom of the box at a vertical height of between 3½ and 4 feet from the road surface. Because of varying road and curb conditions and other factors, the USPS recommends that customers contact the postmaster or carrier before erecting or replacing their mailboxes and supports.

632.525 Grouping

Boxes should be grouped wherever possible, especially at or near crossroads, service turnouts, or other places where a considerable number of boxes are presently located.

632.526 More Than One Family

If more than one family wishes to share a mail receptacle, the following standards apply:

- a. *Route and Box Number Addressing.* On rural and highway contract routes authorized to use a route and box numbering system (e.g., RR 1 BOX 155), up to five families may share a single mail receptacle and use a common route and box designation. A written notice of agreement, signed by the heads of the families or the individuals who want to join in the use of such box, must be filed with the postmaster at the distributing office.
- b. *Conversion to Street Name and Number Addressing.* When street name and numbering systems are adopted, those addresses reflect distinct customer locations and sequences. Rural and highway contract route customers who are assigned different primary addresses (e.g., 123 APPLE WAY vs. 136 APPLE WAY) should erect individual mail receptacles in locations recommended by their postmasters and begin using their new addresses. Customers having *different primary addresses*, who wish to continue sharing a common receptacle, must use the address of the receptacle's owner and the "care of" address format:

JOHN DOE
C/O ROBERT SMITH
123 APPLE WAY

Customers having a common primary address (e.g., 800 MAIN ST, but different secondary addresses (e.g., APT 101, APT 102, etc.) may continue to share a common receptacle if single-point delivery is

authorized for the primary address. Secondary addresses should still be included in all correspondence.

632.527 Locks

The use of locks on mailboxes on rural and highway contract routes is not required. If, however, a box is equipped with a lock, the box must have a slot large enough to accommodate the customer's normal daily mail volume. The USPS does not open locked boxes and does not accept keys for this purpose.

632.528 Unstamped Newspapers

Curbside mailboxes are to be used for mail only, except for newspapers regularly mailed at Periodicals rates. Publishers of these newspapers may, on Sundays and national holidays only, place copies of the Sunday or holiday issues in the rural and highway contract route boxes of subscribers, with the understanding that these copies must be removed from the boxes before the next day on which mail deliveries are scheduled.

632.529 Newspaper Receptacles

A receptacle for the delivery of newspapers may be attached to the post of a curbside mailbox used by the USPS under the following conditions: no part of the receptacle touches or is attached to or is supported by any part of the mailbox, interferes with the delivery of mail, obstructs the view of the flag, or presents a hazard to the carrier or the carrier's vehicle. The receptacle must not extend beyond the front of the box when the box door is closed. No advertising may be displayed on the outside of the receptacle, except the name of the publication.

632.53 Nonconforming Mailboxes

Carriers must report to the postmaster any mailboxes not conforming to postal regulations. The postmaster sends Form 4056, *Your Mailbox Needs Attention*, to the owners of these boxes, requesting that they remedy the irregularities or defects.

632.6 Apartment House Receptacles**632.61 General**

Specifications for construction and approval procedures for manufacturers are covered in USPS STD-4 (RDD), *USPS Standard Receptacles, Apartment House Mail*. Individuals or firms interested in the manufacture of apartment house mailboxes should write to:

PROCUREMENT QUALITY ASSURANCE
US POSTAL SERVICE
475 L'ENFANT PLAZA SW
WASHINGTON DC 20260-6203

632.62 Installation**632.621 General**

Owners and managers of apartment houses, family hotels, flats, or complexes with obsolete apartment house mail receptacles should install

up-to-date receptacles approved by the USPS to ensure more adequate protection. When such buildings are substantially renovated or remodeled to provide additional apartments, or when location of the boxes changes, obsolete receptacles should be replaced with currently approved receptacles.

632.622 **Location and Arrangement**

Regulations for the location and arrangement of receptacles are as follows:

- a. Receptacles and parcel lockers in apartment houses should be located reasonably close to the entrance in vestibules, halls, or lobbies. The carriers must be able to serve the boxes without interference from swinging or open doors. The area must be adequately lighted to afford the best protection to the mail and to let carriers read addresses on mail and names on boxes without undue eye strain.
- b. Installation of standard, approved apartment receptacles in exterior walls of buildings may be authorized, provided that they are not installed directly on the street or a public sidewalk. Wherever possible, keep at least 15 feet between the boxes and the street or sidewalk; the location should be clearly visible from one or more apartment windows. A canopy must be provided, and it must be designed and located to afford maximum protection from the weather, including driving rains. In addition, adequate night lighting must be installed.
- c. Vertical-type installations must meet the following requirements:
 - (1) Receptacles must be installed so that the center of the barrel of the master lock of the upper tier is no more than 58 inches from the floor. The center of the barrel of the master lock of the lower tier of letter boxes must be at least 30 inches from the floor.
 - (2) Do not install more than two tiers; boxes must be arranged in groups. No more than seven boxes in each group may be installed under one Arrow lock. When there are fewer than seven apartments or if telephone units are installed with the boxes, fewer than seven may be grouped but never fewer than three.
- d. In horizontal-type installations, the distance from the finished floor to the tenant locks on the top tier of letterboxes should be no more than 67 inches; the distance to the bottom of the lowest tier of letter boxes should be no less than 28 inches.

632.623 **Access to Rear-Loading of Horizontal-Type Receptacles**

Provide access to rear-loading installations by a door fitted with an inside Arrow lock that opens into a room with at least 3 feet of unobstructed work space from the rear of the units to the wall. The room must be adequately ventilated and lighted. The rear of the unit must have a door or cover of suitable material to prevent the removal of mail from adjacent boxes and to prevent mail from coming out through the back. The cover or door must be either easily opened and closed or removed and replaced by the letter carrier.

632.624 **Installation With Telephone Units**

The guidelines for installing receptacles with telephone units are as follows:

- a. When it is necessary or desirable to install mail receptacles with a standard-size telephone unit, vertical-type receptacles may be placed in

two tiers. They may also be installed in groups of fewer than seven if necessary to properly arrange the groups in two tiers. This does not apply if the telephone unit is installed independently of the mail receptacles. Although there is no objection to combining these two services, the mail receptacles must be separated from the telephone or electrical unit. Electric pushbuttons, connected to wires outside the mail receptacles, may be placed in the frame of the installation if the pushbuttons can be removed from the outside and if the wire connections can be repaired without removing the receptacles.

- b. Telephone units combined with mail receptacle units must allow access to the telephone unit without having to enter the mail receptacle; the mail receptacle must not be accessible when the telephone unit is opened.

632.625 Key and Record Controls

The following key and record controls apply for apartment houses:

- a. Apartment house managers must maintain a record of the number of keys supplied by manufacturers so that new keys may be ordered when necessary. The record should match the key number to the receptacle number. Do not place key numbers on the outside barrels of the locks because this would allow unauthorized persons access to keys and boxes. Clearly number each individual receptacle lock on the back; replace lost keys according to lock numbers. Master-keying is not permitted.
- b. Apartment house managers must also maintain a record of key numbers and combinations of keyless locks so that new tenants may be given the combination. These records must be kept in the custody of the manager or a trusted employee. The record of key numbers must be kept until the lock is changed, when it may then be destroyed.
- c. Combination locks are not approved under current Postal Service receptacles standards.

632.626 Directories

The guidelines for apartment house directories for USPS use are as follows:

- a. For all apartment houses with 15 or more receptacles, maintain a complete directory of all persons receiving mail. If an apartment house is divided into units, each with separate entrances and 15 or more receptacles, each unit should have a separate directory. In addition, if mail is not generally addressed to specific units, a directory must be kept at the main unit of the building listing all persons receiving mail in the various units.
- b. Directories must be alphabetical by surname and must be maintained and kept up-to-date. The receptacle number and apartment number should always be the same and the apartment number should appear to the right of the name in the directory. If the apartment number is different from the receptacle number, the receptacle number should appear to the left of the name in the directory. Follow the same arrangement for apartments that are either lettered or lettered and numbered.

- c. The directory must be legible, enclosed in a suitable protective frame, and attached to the wall immediately above or to the side of the mail receptacles where it can be easily read. If mailrooms are used, the directory should be placed for the carrier's convenience. If an attendant, such as a telephone operator, doorman, or elevator conductor, is on duty between the hours of 7:00 a.m. and 11:00 p.m., and the mail is delivered either to apartment house receptacles or in bulk for distribution by employees of the building, the employee on duty in the building may keep the directory to make it available to the carrier or special delivery messenger on request.

632.627 **Maintenance and Repair**

The guidelines for receptacle maintenance and repair are as follows:

- a. Owners or managers of buildings must keep receptacles in good repair. When an inside-letterbox Arrow lock is no longer needed, the building management must immediately notify the postmaster, who will then send a postal employee to supervise removal of the lock from the master door and return it to the post office.
- b. Carriers will report on Form 3521, *House Numbers and Mail Receptacles Report*, all apartment houses that are being remodeled and all unlocked or out-of-repair mailboxes. Delivering employees and postmasters must ensure that all inside-letterbox Arrow locks are recovered when buildings are torn down or remodeled.
- c. Upon receipt of a report of lack of repair or irregularity in the operation of apartment house mail receptacles, postmasters will promptly initiate an investigation and direct what repairs must be made by, and at the expense of, the owners or managers. To avoid any questions about disposition or treatment of mail, repairs must be made only when a postal representative is present. It is unlawful for anyone other than postal employees to open receptacles and expose mail.
- d. Failure to keep boxes locked or in proper repair as directed by postmasters is sufficient justification for withholding mail delivery and requiring occupants to call for their mail at the post office or carrier delivery unit serving the area. A reasonable notice of approximately 30 days will be given in writing to the customers and the owner or manager of the apartment building.
- e. If mail deposited by a carrier in an apartment house mail receptacle is reported lost or stolen, or if there is an indication that the mail has been willfully or maliciously damaged, defaced, or destroyed, the postmaster must immediately report the circumstances to the Postal Inspection Service.
- f. The U.S. Code prescribes criminal penalties for the wrongful possession of mail locks and the willful or malicious injury or destruction of letterboxes and the theft of mail therefrom.

632.628 Manufacturers

The following is a list of approved manufacturers of apartment house mail receptacles:

Approved Manufacturers of Apartment House Mail Receptacles

AMERICAN DEVICE MFG PO BOX 8 STEELEVILLE IL 62288-0008 (800) 637-3763 Models: H, V	CUTLER MFG CORP PO BOX M EATON PARK FL 33840-1903 (800) 237-2312 Models: C, N, H, V, P, U
AMERICAN LOCKER GROUP PO BOX 1000 JAMESTOWN NY 14702-1000 (716) 664 9600 (800) 828-9118 Outside New York Models: C, P	FLORENCE CORP 2101 N ELSTON AVE CHICAGO IL 60614-3993 (800) 275-1747 Models: N, H, V
BOMMER INDUSTRIES PO BOX 187 LANDRUM SC 29356-0187 (800) 334-1654 Models: N, H, V	JENSEN INDUSTRIES 1946 E 46TH ST LOS ANGELES CA 90058-2097 (800) 826-7001 (California ONLY) (800) 325-8531 Models: H, V
LESLIE-LOCKE INC 4501 CIRCLE 75 PKY STE F-6300 ATLANTA GA 30339-3025 (800) 775-9392 Model: N	SECURITY MFG CO 815 S MAIN ST GRAPEVINE TX 76051-5535 (800) 762-6937 Models: H, V, U
PAGE SPECIALTY CO 5877 SO FULTON WAY ENGLEWOOD CO 80111-3719 (800) 770-2842 (Colorado only) (800) 327-7439 Model: U	

632.63 New or Remodeled Apartment Buildings

When new apartments are being erected or existing ones remodeled, postmasters will inform builders and owners of the requirements of these regulations and will provide a suitable inspection to ensure that safe and durable receptacles are installed in conformance to these regulations. Postal Service-approved parcel lockers may be used voluntarily with approved mail receptacles.

the carrier draws. The sets of keys may be issued to regular carriers upon surrender of key checks issued to them.

633.53 Keys Assigned to Other Employees

Keys assigned to other employees for collection purposes must be accounted for as prescribed above.

633.6 Keys Lost, Stolen, Missing, or Found

Report the recovery or finding of keys in the same manner as described in ASM 273, except that a duplicate copy of the memorandum shall be sent direct to the Mail Equipment Shops with the key. Retain serviceable LA keys for local use if needed.

633.7 Keys From Discontinued Offices

Handle keys from discontinued offices under instructions received from the district manager.

633.8 Unserviceable Keys

Forward unserviceable mail keys by registered mail to:

MAIL EQUIPMENT SHOPS
US POSTAL SERVICE
2135 5TH ST NE
WASHINGTON DC 20260-6224

A letter of transmittal or a list of the keys by number is not necessary, but the package of keys must be properly identified. Do not send any other item or requisition in the same package with unserviceable keys.

633.9 Receipt and Control

Receipt and control all mail keys and locks according to the instructions in subchapter 250 of Handbook AS-701, *Material Management*.

64 City Delivery Service

641 Establishment of City Delivery Service

See 63 for authorized modes of delivery.

641.1 Definition

In this section, *establishment* refers to the initiation of city delivery service in a community through a post office that does not currently provide it.

641.2 Requirements

In establishing city delivery service, a combination of delivery methods is considered to provide adequate service to all residential and business sections of a community. All establishments of delivery service must have

final approval of the district manager, Customer Service and Sales, or designee. Establishment of city delivery service is considered when the following essential requirements are met:

- a. Within the area to be served there is a population of 2,500 or more or 750 possible deliveries. (The postal customer population may vary greatly from the general census population because of different boundary interpretations and designations.)
- b. At least 50 percent of the building lots in the area to be served are improved with houses or business places. Where a house or building and its yard or ground cover more than one lot, all lots so covered are considered improved.
- c. The streets are paved or otherwise improved to permit the travel of Postal Service vehicles at all times, without damage or delay.
- d. Streets are named and house numbers are assigned by the municipal authorities in accordance with Management Instruction DM-940-89-3, *Addressing Conventions*.
- e. The street signs are in place and the house numbers are displayed.
- f. The rights-of-way, turnouts, and areas next to the roads and streets are sufficiently improved so that the installation and servicing of boxes is not hazardous to the public or USPS employees.
- g. Satisfactory walks exist for the carrier where required.
- h. Approved mail receptacles or door slots are installed at designated locations.

642 Extensions

642.1 Definition

In this section, *extension* refers to the expansion of city delivery service to any areas not currently receiving delivery service but that are within the delivery limits of a post office from which city delivery service is already provided.

642.2 Requirements

The delivery service requirements for extensions are the same as those listed in 641.2 for establishments, with the following exceptions:

- a. Section 641.2a does not apply to extensions.
- b. The applicability of b may be waived if:
 - (1) There is a reasonable expectation that the requirements of 641.2b can be met within 12 months, and
 - (2) CBU's or NDCBU's are to be used for delivery.

642.3 Out-of-Bounds Customers

Customers outside the limits of city delivery service may be given delivery service if they erect boxes on the delivery carrier's line of travel. Special delivery, parcel post, insured, certified, COD, and registered mail are

652.3 Requirements**652.31 Customer Density**

A newly established route should serve an average of at least one residential or business delivery per mile. On routes of less than 10 miles, an average of at least six deliveries per mile should be eligible for service before a route is established. Unusual conditions such as the volume and type of mail should be considered.

652.32 Minimum Workloads

In post offices with no existing rural delivery service, the proposed route evaluation should reflect sufficient workload to meet minimum rural carrier scheduling requirements efficiently, unless the intermediate office concept can be used in conjunction with an existing rural route (see Handbook M-38, *Management of Rural Delivery Services*, 225).

652.33 Roads**652.331 General**

Roads should generally be public and must be well maintained and passable for delivery vehicles year round.

652.332 Road Maintenance

Rural delivery service is not established over roads that are not kept in good condition, that are obstructed by gates, or that cross unbridged streams that are not fordable throughout the year. If travel over private roads is proposed, the person responsible for road maintenance must provide a written agreement to keep the road passable at all times. The agreement must include the statement: "It is understood that if the road is not properly maintained, rural delivery service will be withdrawn."

652.4 Submission and Approval**652.41 Postmasters**

Forward requests for establishment of delivery to the district, along with the proposed route statistics, a completed Form 4003, *Official Rural Route Description*, a map clearly identifying the potential line of travel, road maintenance agreements, and any other relevant documentation. Include a recommendation.

652.42 District Responsibilities**652.421 Review and Approval**

The district manager or designee must review and approve any requests for establishment of rural delivery.

652.422 Delivery Boundaries

Districts should avoid duplication of existing delivery and the commingling of delivery boundaries with another post office. Postmasters' recommendations, customer preferences, and community or municipal identity should be considered in establishing delivery boundaries.

652.423 Support

If the request is approved, ensure that necessary equipment, staffing, rural delivery management procedures, and so forth, are in place prior to initiating service.

652.424 Customer Notification

Ensure that customers are notified of changes in service promptly.

653 Extensions**653.1 Definition**

In this section, *extension* refers to the expansion of rural delivery service into any areas not presently receiving delivery service, but within the delivery limits of a post office for which rural delivery has already been established. See 631 for authorized modes of delivery.

Note: Provide carrier service to persons who erect approved boxes on the line of travel of the rural carrier, and to persons for whom approved neighborhood delivery and collection boxes and parcel lockers are erected and maintained by the USPS on the carrier's line of travel, but no rural carrier service may be extended to persons residing within the boundary formed by existing city delivery service.

653.2 Eligibility

At noncity delivery post offices of the first-, second-, and third-class, rural delivery may be extended to families who reside outside a 1/4-mile radius (1/2-mile radius for fourth-class post offices) of the post office if such service is requested and the other requirements in this section are met. Customers residing within the 1/4-mile radius may erect a box along the carrier's established line of travel.

653.3 Requests

Customers may request extension of rural delivery service using Form 4027.

653.4 Customer Density

Extensions must serve a minimum of one customer per mile of additional travel, including retrace.

653.5 Roads

The requirements of 652.33 must be met.

653.6 Multiple Routes

Where routes from two or more post offices travel one road, the district will determine which office will provide delivery and contact the appropriate postmaster for the resulting route assignment.

619.4 Overprinting

Information such as post office, station, or branch; address; business hours; and telephone number on Form 3849 can be overprinted more economically at the same time the basic form is printed. This must be limited, however, to large quantities (20,000 or more) and in increments of 20,000 thereafter (for example, 80,000, 100,000, and so forth). The area office coordinates the overprinting.

62 Delivery Schedules and Trip Frequencies

621 Schedules**621.1 Express Mail, First-Class Mail, and Priority Mail**

Deliver on the first trip all Express Mail, First-Class Mail, and Priority Mail received at the central distribution facility prior to the established cut-off time.

621.2 Periodicals

Deliver Periodicals on the first scheduled delivery trip following receipt at the delivery unit, provided that such delivery does not delay First-Class Mail.

621.3 Standard Mail (A)

Deliver Standard Mail (A) not later than second delivery day after day of receipt. (Day of receipt begins at midnight unless the area manager approves a different time.) Deliver mail received on Saturday no later than Tuesday. Deliver circulars received on a day preceding a holiday no later than the second delivery day following the holiday.

621.4 Standard Mail Parcels

Where possible, schedule delivery of Standard Mail parcels so as to maintain published service standards for these classes of mail.

622 Trip Frequencies

Frequency changes must be approved by the area manager.

623 Withdrawal of Delivery Service**623.1 Suitable Receptacles**

Consider withdrawing service if a customer does not provide a suitable mail receptacle after being so notified by Form 1507, *Request to Provide Proper Mail Receptacle* (city delivery routes); by Form 4056, *Your Mailbox Needs Attention* (rural and highway contract routes); by letter or verbally.

623.2 **Blocked Mail Receptacles**

623.21 **General**

The customer is responsible for keeping the approach to the mailbox clear to facilitate delivery (see 632.13). If the carrier continually experiences a problem in serving curblin boxes and where the customer is able to control access or on-street parking in front of his or her mailbox but does not take prompt corrective action after being properly notified, the postmaster may, with the approval of the district manager, withdraw delivery service.

623.22 **Delivery to Mailbox Inside of a Screen or Storm Door**

These mailboxes must meet the following requirements:

- a. When the box is inside a screen or storm door, the door must be left unlocked; otherwise, the box should be located outside the door or a slot should be provided in the outer door.
- b. When porches are screened in or enclosed by other material, and are used as living or sleeping quarters, the screen or storm door is considered the entrance door to the house. In these cases, request that customers place their mail receptacle outside the door or provide a slot in the door.

623.3 **Safety or Security**

Delivery service may be suspended when there is an immediate threat (including, but not limited to, threats due to loose animals) to the delivery employee, mail security, or postal property. Suspension of service should be limited to an area necessary to avoid the immediate threat. Postmasters should request corrective action from responsible parties and restore normal service as soon as appropriate.

623.4 **Travel Obstructions**

Persons responsible for road maintenance must be notified of road conditions obstructing the delivery of mail. If repairs are not made promptly, service may be withdrawn with the approval of the district manager. Resume service as soon as the road conditions are improved.

DECLARATION


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

Linda A. Kingsley

Date: 3-24-2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, appearing to read "Susan M. Duchek", is written over a solid horizontal line.

Susan M. Duchek

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March 24, 2000