

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 MAYO
TO INTERROGATORIES OF DAVID B. POPKIN,
REDIRECTED FROM THE POSTAL SERVICE
(DBP/USPS-44, 45, 47-52(D), 53-54, 56, AND 69)

The United States Postal Service hereby provides the responses of witness Mayo to the following interrogatories of David B. Popkin: DBP/USPS-44, 45, 47-52(d), 53-54, 56, and 69, filed on March 20, 2000, and redirected from the Postal Service.

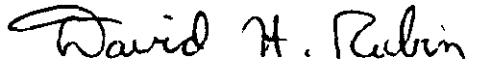
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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April 3, 2000

**RESPONSE OF POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DAVID B. POPKIN
REDIRECTED FROM THE POSTAL SERVICE**

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

RESPONSE:

The window clerk writes the city, state, and ZIP Code of the recipient in the top box. The mailer normally would write the recipient's name, street address, and city, state, and ZIP Code in the three bottom boxes, respectively unless the window clerk does this for the mailer. The top box has been designed for future use with the POS-1 system. POS-1 will automatically print the information the clerk currently writes in the top box.

Incidentally, the forms you are referring to with the "Article Sent To" box at the top are dated July 1999 and have been replaced with new forms dated February 2000 (attached). The new forms no longer have the words "Article Sent To" so as to alleviate any confusion it may have caused the mailer.

PLACE STICKER AT TOP OF ENVELOPE
TO THE RIGHT OF RETURN ADDRESS.
FOLD AT DOTTED LINE

CERTIFIED MAIL



7000 0520 0017 2917 7620
7000 0520 0017 2917 7620

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

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Postage	\$ /
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Recipient's Name (Please Print Clearly) (To be completed by mailer)

Street, Apt. No.; or PO Box No.

City, State, ZIP+ 4

PS Form 3800, February 2000 See Reverse for Instructions

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A signature upon delivery
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail or Priority Mail.
- Certified Mail is not available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

United States Postal Service
INSURED MAIL
DOMESTIC - INTERNATIONAL



VV 600 435 508 US

NOTE: To file a claim for damage or loss of contents, the article, container, and packaging must be presented.

VV 600 435 508 US

U.S. Postal Service INSURED MAIL RECEIPT		
<input type="checkbox"/> Fragile <input type="checkbox"/> Liquid <input type="checkbox"/> Perishable Insurance Coverage:		
Postage	\$	Postmark Here
Insurance Fee		
Restricted Delivery Fee (Domestic only; endorsement required)		
Special Handling Fee		
Return Receipt Fee (Except for Canada; endorsement required)		
Total Postage & Fees	\$	
Recipient's Name (Please Print Clearly - To be completed by mailer)		
Street, Apt. No.; or PO Box No.		
City, State, ZIP+4, Country		
PS Form 3813-P, Feb 2008		

COVERAGE: Insurance is provided only in accordance with postal regulations in the Domestic Mail Manual (DMM), and for international shipments, the International Mail Manual (IMM). The DMM and IMM set forth the specific types of losses that are covered, the limitations on coverage, terms of insurance, and conditions of payment. Copies of the DMM and IMM are available for inspection at any post office. Merchandise is insured against loss, damage, or rifting. Coverage may not exceed the limit fixed for the insurance fee paid. Limitations prescribed in the DMM and IMM provide, in part, that:

- Domestic insurance covers the actual (depreciated) value of the contents, or the cost of repairs. The limitations on coverage include, but are not limited to, the following: No coverage is provided for consequential losses, delay, concealed damage, spoilage of perishable items, articles improperly packaged, or articles too fragile to withstand normal handling in the mails.
- International insurance coverage is subject to both U.S. Postal Service regulations and the domestic regulations of the destination country. Insurance coverage varies by country and is not available to some countries. The addressee must report damage of an insured article's contents to the delivering post office immediately. No coverage is provided for delay, prohibited articles, concealed damage, or consequential losses.

FILING CLAIMS: All indemnity claims for loss must be filed within one year from the date the article was mailed. All claims for damage or rifting must be filed immediately. The original mailing receipt must be presented when filing a claim. The article, container, and packaging must be presented to file a claim for damage or loss of contents. Evidence of value or damage such as a sales receipt or repair estimate must be submitted in support of all claims.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3813-P, Feb 2008 (Reverse) 102585-88-01-1274

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DBP/USPS-45. With respect to the proper completion of PS Form 3811, Return Receipt, as observed on a mailing of twelve [the ones that had a manual signature] Certified Mail letters that I mailed last month, [a] Confirm that the name of the person signing the receipt should be printed in Part A. [b] Please explain why 11 of the 12 receipts that I received did not have the printed name? [c] Confirm that the date of delivery should be entered in Part B. [d] Confirm that the date of the month alone is not a satisfactory entry for the Date of Delivery. [e] Confirm that the month and the date of the month alone is not a satisfactory entry for the Date of Delivery. [f] Confirm that the Date of Delivery must include a month, date, and year to be correct. [g] Please explain why one return receipt did not have any date of delivery and three did not show the year of delivery. [h] Please confirm that one of the two boxes in Part C, namely Agent or Addressee, must be checked in all instances. [i] Please explain why only one return receipt had a check mark. [j] Please confirm that one of the two boxes in Part D, namely Yes or No, must be checked in all instances. [k] Please explain why none of the twelve return receipts had a box checked. [l] Confirm that a mailer, such as myself, would be required to pay \$1.25 to obtain the additional return receipt service on each of the twelve letters that were mailed. [m] Confirm that the printed name box may add to the value of the return receipt service depending on the needs and requirements of the mailer. [n] Confirm that the Date of Delivery information may add to the value of the return receipt service depending on the needs and requirements of the mailer. [o] What is the period of time that the Postal Service will maintain delivery records for accountable mail? [p] Confirm that once the period of time provided in response to Subpart [o] has passed, it will not be possible for the Postal Service to advise whether a return receipt card with the Date of Delivery shown as 2-11 was February 11, 1997, 1998, or for that matter any given year [other than the dates that fall within the times shown in response to Subpart [o] - assuming that the delivery receipts and the appropriate search have been properly completed]. [q] Confirm that having an accurate date of delivery shown on the return receipt may add to the value of the return receipt service depending on the needs and requirements of the mailer. [r] Please explain why 6 of the 9 tax returns that I filed last year by Certified Mail - Return Receipt had incorrect dates of delivery shown on them. [s] Confirm that the status of the signer, Agent or Addressee, information may add to the value of the return receipt service depending on the needs and requirements of the mailer. [t] Confirm that the checking of the Yes or No box in Part D may add to the value of the return receipt service depending on the needs and requirements of the mailer. [u] Confirm that the Yes or No box in Part D was established so that a mailer would have a positive notation that the delivery address was or was not the same as the address the article was addressed to, namely, without the Yes/No box, no new address shown could either mean that the article was delivered as addressed or the new address was not shown as required. [v] Confirm that a mailer utilizing return receipt service would normally have to assume, unless there was contradictory evidence such as the card showing a date of delivery before the date of mailing or showing a date of delivery after

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DBP/USPS-45. CONTINUED

the card was received back, that the date of delivery as shown on the return receipt card was correct. [w] Is a mailer who receives an improperly completed card entitled to a refund of the return receipt fee? If not, why not? [x] What action should a mailer take if the return receipt is returned without being properly completed? [y] Confirm that a mailer may obtain a Duplicate Return Receipt when a return receipt is either not received or is received without being properly completed. [z] Please explain the procedure, in detail, that a mailer must follow to obtain a duplicate. [aa] Confirm that a mailer has the option of either mailing a Certified Mail letter at a post office for postmarking the receipt or just mailing the letter without obtaining a mailing receipt. [bb] Confirm that once the latter has been mailed, either with or without getting the receipt postmarked, the letter is processed and delivered the same way. [cc] Confirm that a mailer who requests a Duplicate Return Receipt will be able to obtain it without payment if he is able to present a postmarked receipt that shows that a return receipt was paid for at the time of mailing. [dd] Confirm that a mailer who requests a Duplicate Return Receipt will be able to obtain it by making a payment if he is unable to present a postmarked receipt that shows that a return receipt was paid for at the time of mailing. [ee] Confirm that many mailers may not realize the importance of having the mailing receipt postmarked to save the potential cost of a duplicate return receipt. [ff] Why doesn't the mailing receipt indicate this requirement in the last bullet item? [gg] Confirm that the necessity of obtaining a duplicate return receipt will reduce the value of service to most mailers. [hh] Are return receipts checked by a postal employee before they are returned to the mailer? [ii] If so, please advise the items which are checked? [jj] Would proper checking of return receipts eliminate the problems with return receipts? If not, why not? [kk] What percentage of all return receipts receive this post delivery checking? [ll] Please explain and discuss any subparts you are not able to confirm.

RESPONSE:

- a. Not confirmed. The person signing for the article may not necessarily be the person initially receiving the article.
- b. I have no information with which to answer the question. I would need quite a bit of information before I could begin to speculate.

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DBP/USPS-45. CONTINUED

- c. Confirmed.
- d. Confirmed.
- e-f. Not confirmed. The year of delivery would not have to be printed for the date to be correct.
- g. See my response to (b).
- h. Not confirmed. If the return receipt was signed by someone other than the person to whom the article was addressed, the "agent" box should be checked. If it is obvious from the signature and printed name of the person receiving the article that they are the person the article was addressed to checking the "addressee" box would not be necessary.
- i. See my responses to (b) and (h).
- j. Not confirmed. If the delivery address is different from the address in section 1, the delivery address will be entered in section D. Therefore, checking the yes or no box would not be necessary.
- k. See my responses to (b) and (j).
- l. Confirmed.
- m. Confirmed.
- n. Confirmed.
- o. The Postal Service will maintain delivery records for accountable mail for two years.

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DBP/USPS-45. CONTINUED

- p. Confirmed.
- q. Confirmed.
- r. See my response to (b).
- s. Confirmed.
- t. Confirmed if there is no delivery address written in part D. See my response to (j).
- u. See my response to DFC/USPS-T39-5(a).
- v. Confirmed that that would be a reasonable assumption.
- w. Not if the return receipt service was provided. I would need more information as to what "improperly completed" means. See response of witness Plunkett to your Docket No. R97-1 interrogatory, DBP/USPS-34.
- x. A mailer could consult either his/her local postmaster or the postmaster at the office where the accountable mailpiece was delivered if the mailer receives a return receipt he/she believes was not properly completed, and he/she needs additional information.
- y. See response of witness Plunkett to your Docket No. R97-1 interrogatory, DBP/USPS-34.
- z. See DMM S915.4 for the procedure for obtaining a duplicate return receipt.
 - aa. Confirmed.
 - bb. Confirmed.
 - cc. Confirmed.

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DBP/USPS-45. CONTINUED

dd. Confirmed.

ee. Not confirmed. It is clearly stated on the back of the Form 3800 that to receive a fee waiver for a duplicate return receipt, a Postal Service postmark is required on the Form 3800.

ff. The bullet item on the back of the Form 3800 that discusses Form 3811 provides information on receiving a fee waiver for a duplicate return receipt.

gg. Not confirmed. The knowledge that the mailpiece was delivered and signed for would provide the value of service, regardless of whether or not it is on an original or a duplicate return receipt.

hh-ii. The delivery employee for the accountable mailpiece would check the return receipt as part of the form completion process. See witness Plunkett's responses to your Docket No. R97-1 interrogatories, USPS/DBP-28 and USPS/DBP-29.

jj. I do not know.

kk. If you are referring to the form completion process done by the delivery employee then all return receipts would receive post delivery checking. See response to hh-ii.

ll. See responses above.

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

RESPONSE:

- a-b. See witness Plunkett's response to your Docket No. R97-1 interrogatory DBP/USPS-27.
- c. See response to DFC/USPS-T39-5(c) and witness Plunkett's response to your Docket No. R97-1 interrogatory DBP/USPS-27.
- d. No such tests have been conducted.
- e. Not applicable.
- f. I would assume most return receipt customers would be more concerned about the delivery of the accountable mailpiece and not very concerned about the address if different, just so long as the piece was delivered and signed for. Prior to Docket No. MC96-3 when the whom and when delivered was combined with whom, when, and where delivered for return receipt service, an overwhelming majority of customers did not choose the address if different option. See my testimony at pages 135-136 where I discuss the value of service from return receipts.

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DBP/USPS-48. [a] Confirm, or explain if you are unable to do so, that Section 822.111 of the Postal Operations Manual [POM] requires that the delivering carrier or window clerk will obtain the signature or authorized signature stamp of the recipient of an article utilizing the Return Receipt Service. [b] Confirm, or explain if you are unable to do so, that POM Section 822.111 also requires the delivery employee must complete the date of delivery if the addressee has not already done so. [c] Would it be reasonable to expect the delivery employee to check to ensure that the Return Receipt has been properly signed? [d] Would it be reasonable to expect the delivery employee to check to ensure that the Return Receipt has the name of the addressee printed in addition to the signature? [e] Would it be reasonable to expect the delivery employee to check to ensure that the Return Receipt has the correct date of delivery entered on it? [f] Would it be reasonable to expect the delivery employee to check to ensure that the Return Receipt has been properly completed? [g] Would it be reasonable to expect the delivery employee to make any necessary corrections to the information provided on the return receipt? [h] Explain any negative answers to subparts c through g. [i] Will the delivery employee referenced in POM Section 822.111 always be an employee of the United States Postal Service? [j] If your response to subpart h is not an unqualified yes, list all examples and instances in which the delivery employee will not be a USPS employee. [k] Do the requirements of POM Section 822.111 apply to the necessity of having the delivery employee ensure that the Return Receipt is completed at the time of delivery [the time at which the custody of the mail is transferred from the control of the United States Postal Service to the control of the addressee]? [l] If not, explain any instances in which it is not required. [m] Do the requirements of POM Section 822.111 apply to the necessity of having the delivery employee ensure that the Return Receipt is completed at the time of delivery with respect to all agencies, departments, or organizations of the federal government? [n] Same as subpart [m] except with respect to those of any state or local government. [o] Same as subpart [m] except with respect to delivery to any non-government addressee. [p] Do the requirements of POM Section 822.111 apply to the necessity of having the delivery employee ensure that the Return Receipt is completed at the time of delivery regardless of the number of return receipts that are involved in the delivery? [q] Explain and list any instances with respect to any negative answers to subparts [m] through [o]. [r] Confirm, or explain if you are unable to do so, that the delivering employee will be required in all instances to determine if the delivery address differs from the original address shown on the article and if so to provide the new address on the Return Receipt card. [s] Confirm, or explain if you are unable to do so, that the delivering employee will be required in all instances to determine if the delivery address differs from the original address shown on the article and if not to check the box on the return receipt card to indicate that the article was delivered to the same address as originally addressed. [t] Confirm, or explain if you are unable to do so, that the requirements specified in subparts r and s will apply to all types of addressees including, but not limited to, those types mentioned in subparts m

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DBP/USPS-48. CONTINUED

through o. [u] Confirm, or explain if you are unable to do so, that the delivering employee will be required in all instances to give all return receipts to the clearing clerk daily. [v] Confirm, or explain if you are unable to do so, that subpart u means that for all return receipts which are being requested for mail which is delivered on a given day will be turned over to the clearing clerk that same day. [w] Confirm, or explain if you are unable to do so, that the requirements specified in subpart u will apply to all types of addressees including, but not limited to, those types mentioned in subparts m through o.

RESPONSE:

- a-b. See witness Plunkett's response to your Docket No. R97-1 interrogatory DBP/USPS-28(a-b), filed November 10, 1997.
- c-w. See witness Plunkett's response to your Docket No. R97-1 interrogatory DBP/USPS-28(c-v).

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

RESPONSE:

a-m. See witness Plunkett's revised response to your Docket No. R97-1 interrogatory

DBP/USPS-29.

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

RESPONSE:

a-b. Confirmed that Section 822.21 says "A return receipt on mail addressed to a federal or state official may be signed for with a stamp showing the name and location of the accepting organization..."

c-j. See witness Plunkett's response to your Docket No. R97-1 interrogatory DBP/USPS-30.

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DBP/USPS-51. [a] Confirm that on August 1, 1996, Sandra D. Curran, Acting Manager, Delivery, sent a letter to all District Managers - Subject: Failure to Obtain Signature on PS Form 3811 Domestic Return Receipt. [b] Confirm, or explain if you are unable to do so, that this letter indicates that all District Managers are to take a proactive approach with all of their delivery offices to ensure that return receipts are not being signed for at a "later", more convenient time and therefore this would require that the return receipt be signed for at the time of delivery. [c] Confirm, or explain if you are unable to do so, that this letter indicates that any long standing, unofficial arrangements that promote or provide for exceptions to the state procedures for "convenience" should be voided if they exist. [d] Confirm, or explain if you are unable to do so, that this letter indicates that a lack of realization by some employees that the customer has paid for this service and any arrangement that makes it easier for the addressee at the expense of that service should not be tolerated. [e] Is this letter still in force? [f] If not, provide a copy of the letter which superseded or modified it. [g] Provide copies and references of any directives that have been issued since August 2, 1996 which relate to the provision of return receipt service.

RESPONSE:

- a-d. See witness Plunkett's response to your Docket No. R97-1 interrogatory DBP/USPS-31.
- e. This letter is still in force.
- f. Not applicable.
- g. I am not aware of any directives issued since August 2, 1996.

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

RESPONSE:

- a-b. See witness Plunkett's response to your Docket No. R97-1 interrogatory DBP/USPS-32.
- c. Confirmed only that the **price** for a return receipt is presently \$1.25 for non-merchandise, non-after-mailing service, and this fee would apply for each separate accountable mailpiece for which this return receipt service is requested.
- d. Your multiplication appears to be correct.

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TO INTERROGATORIES OF DAVID B. POPKIN
REDIRECTED FROM THE POSTAL SERVICE**

DBP/USPS-53. In order to determine that the Return Receipt service provides a value to the mailer, [a] Enumerate and provide details of all studies and tests that have been performed or conducted by the Postal Service in the past ten years [since Docket R90-1] to determine the mailing public's needs and desires for return receipt service. [b] Same as subpart a except to determine the quality of service being received by return receipt users. [c] Same as subpart a except to determine the extent to which the return receipt service is being provided as mandated in the regulations. [d] Explain why the responses to subparts a through c indicate that the Postal Service is making a concerted effort to provide a quality service. [e] Confirm, or explain if you are unable to do so, that one of the purposes of the return receipt is to provide evidence of delivery to the sender and that this evidence is being provided by an independent third party, namely the Postal Service. [f] Confirm, or explain if you are unable to do so, that the Postal Service used to apply the red validating stamp to return receipts and that this procedure was terminated. [g] When and why was the use of this procedure terminated and provide copies of the directive doing so? [h] Wouldn't the date on the red validating stamp be more likely to be correct than a date that was handwritten? [i] Wouldn't the presence of the red validating stamp on the return receipt provide a greater level of authenticity of the return receipt than one without it? [j] Explain any negative responses to subparts h and i particularly in light of the desire to provide a quality product. [k] Confirm, or explain if you are unable to do so, that the application of a red validation stamp impression on a return receipt by other than an authorized Postal Service employee would be a violation of the law. [l] Are there any plans to resume the use of the red validating stamp? [m] Confirm, or explain if you are unable to do so, that there are times when the actual date of delivery is significant to the mailer utilizing return receipt service. [n] Confirm, or explain if you are unable to do so, that there are times when name of the recipient is significant to the mailer utilizing return receipt service. [o] Confirm, or explain if you are unable to do so, that there are times when prompt notification of delivery is significant to the mailer utilizing return receipt service. [p] Confirm, or explain if you are unable to do so, that provision of the return receipt as proof of delivery and proof of delivery date having been furnished by an independent, disinterested third party, such as the Postal Service, is significant to the mailer at times. [q] Confirm or explain if you are unable to do so, that failure of the Postal Service to process return receipts in the manner specified in the regulations may increase the likelihood of a decrease in value to the mailer who is expecting one of the services noted in subparts m through p.

**RESPONSE OF POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DAVID B. POPKIN
REDIRECTED FROM THE POSTAL SERVICE**

DBP/USPS-53 CONTINUED

RESPONSE:

- a. See witness Plunkett's response to your Docket No. R97-1 interrogatory DBP/USPS-33.
- b-c. See my response to DFC/USPS-T39-3.
- d-e. See witness Plunkett's response to your Docket No. R97-1 interrogatory DBP/USPS-33.
- f-l. See witness Plunkett's response to your Docket No. R97-1 interrogatory DBP/USPS-33,
filed November 10, 1997.
- m-q. See witness Plunkett's response to your Docket No. R97-1 interrogatory DBP/USPS-
33.

**RESPONSE OF POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DAVID B. POPKIN
REDIRECTED FROM THE POSTAL SERVICE**

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

RESPONSE:

a-o. See witness Plunkett's response to your Docket No. R97-1 interrogatory DBP/USPS-34.

**RESPONSE OF POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DAVID B. POPKIN
REDIRECTED FROM THE POSTAL SERVICE**

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

RESPONSE:

- a-c. See witness Plunkett's response to your Docket No. R97-1 interrogatory DBP/USPS-36.
- d. See my testimony at page 40 where I discuss the Postal Service plans to keep delivery records in a centralized database rather than at the office of delivery.
- e-l. See witness Plunkett's response to your Docket No. R97-1 interrogatory DBP/USPS-36.

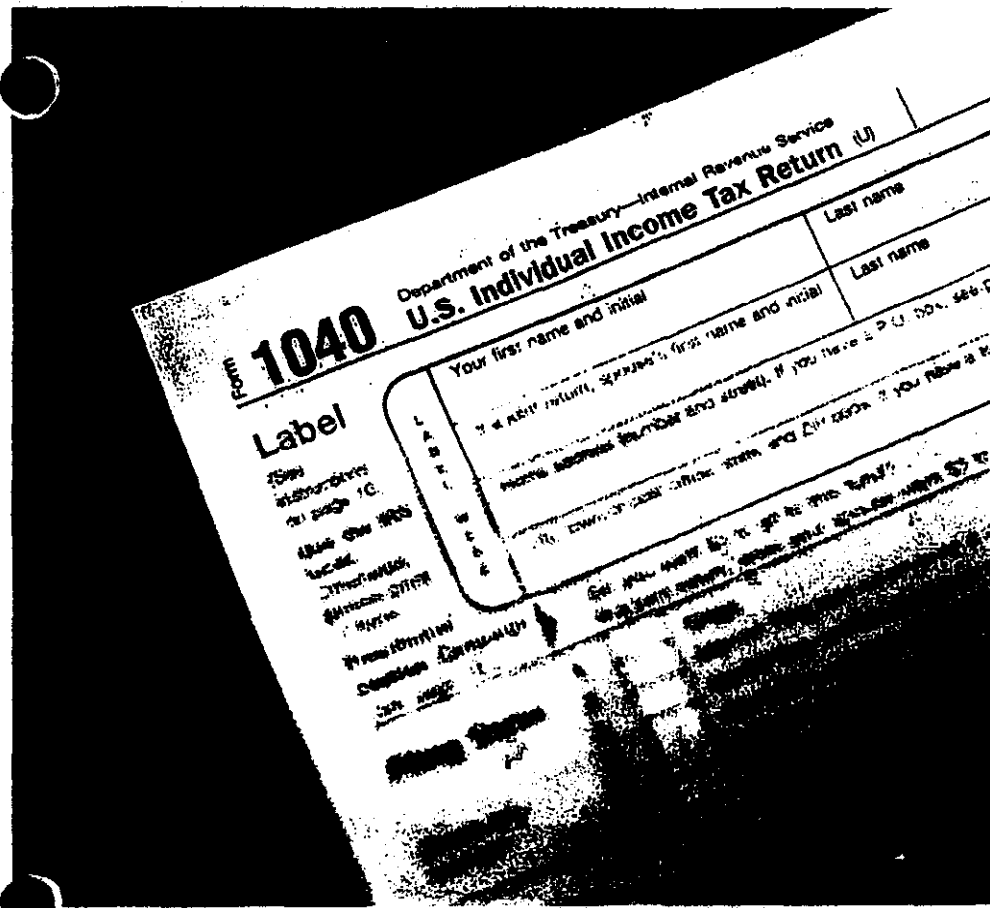
**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORY OF DAVID B. POPKIN
REDIRECTED FROM THE UNITED STATES POSTAL SERVICE**

DBP/USPS-69. Please advise whether the Internal Revenue Service will accept as proof of mailing and/or delivery letters that are sent to them with each of the following services: [a] Certificate of Mailing [b] Certified Mail [c] Certified Mail / Return Receipt [d] Delivery Confirmation [e] Signature Confirmation [f] Express Mail. [g] Please provide any instructions or posters, in the past three years, which relate to the use of special services with respect to mail sent to the IRS.

RESPONSE:

a-f. You need to ask the Internal Revenue Service about its policies and regulations and interpretation of relevant laws. The Postal Service cannot answer for another Government agency.

g. Attached.



If you wait until after April 15 to *learn* about Special Services, it may be *too* late.



POSTCARDS/SPECIAL SERVICES/TAX FORM/BACK

Four ways the United States Postal Service provides you with peace of mind.



Certificate of Mailing:

Offers official proof that an item was mailed. A Certificate can be used on any mailed item.



Certified Mail:

Available for First-Class and Priority Mail, this service provides proof that an item was mailed, and a record of delivery. A return receipt, which shows when an item was delivered and who signed for it, can be purchased with this service.



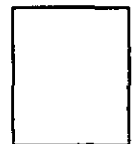
Insured Mail:

Insurance coverage can be purchased for items mailed at the Priority, First-Class and Standard Mail rates. For articles insured for more than \$50, a receipt of delivery is signed by the recipient, and a return receipt can also be purchased.



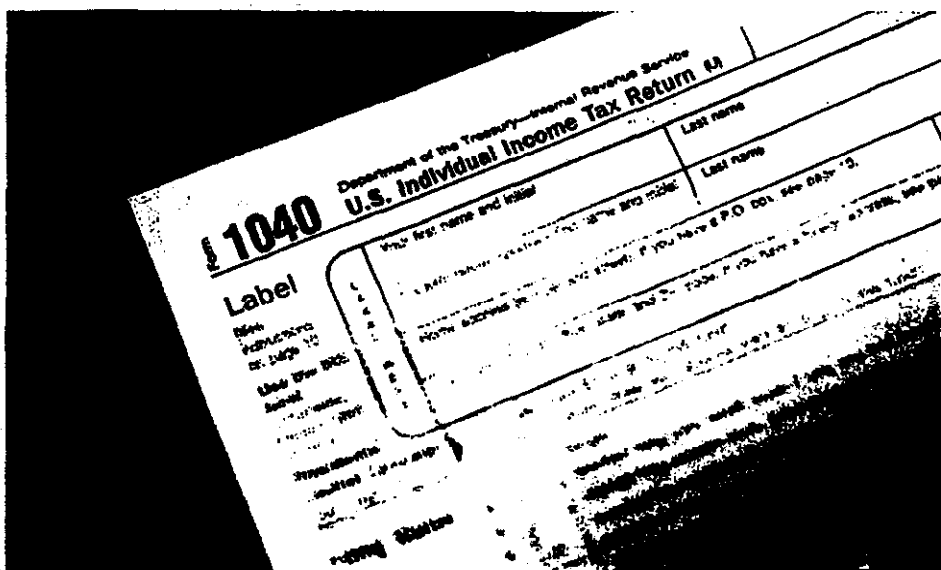
Registered Mail:

Designed for high value First-Class items, this is the most secure delivery option. Like Certified Mail, it provides proof that an item was mailed, and a record of delivery. A return receipt can also be purchased with this service.



We deliver.

VAL-PAK/SPECIAL SERVICES/TAX FORM/FRONT



If you wait until
after April 15
to learn about
Special Services,
it may be too late.



VAL-PAK/SPECIAL SERVICES/TAX FORM/BACK

Four ways the United States Postal Service provides you with peace of mind.



Certificate of Mailing:

Offers official proof that an item was mailed. A Certificate can be used on any mailed item.



Certified Mail:

Available for First-Class and Priority Mail, this service provides proof that an item was mailed, and a record of delivery. A return receipt, which shows when an item was delivered and who signed for it, can be purchased with this service.



Insured Mail:

Insurance coverage can be purchased for items mailed at the Priority, First-Class and Standard Mail rates. For articles insured for more than \$50, a receipt of delivery is signed by the recipient, and a return receipt can also be purchased.



Registered Mail:

Designed for high-value First-Class items, this is the most secure delivery option. Like Certified Mail, it provides proof that an item was mailed, and a record of delivery. A return receipt can also be purchased with this service.



Tax Time Doesn't Have To Be Taxing.

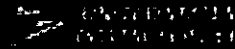
CERTIFIED MAIL



\$2⁶⁵

Prove It
Got There

Cost shown is for Certified Mail and Return Receipt by First-Class Mail.



DECLARATION


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

Susan W Mayo

Dated: April 3, 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.


David H. Rubin

475 L'Enfant Plaza West, SW
Washington, DC 20260-1137
April 3, 2000