

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  
TO INTERROGATORIES OF DAVID B. POPKIN  
(DBP/USPS-55, 59-61, 65, 67 (A-C), 70(L-O), 72(A-E), 73(A-F, H), 74(A), and 75-78)

The United States Postal Service hereby provides its responses to the following interrogatories of David B. Popkin: DBP/USPS-55, 59-61, 65, 67(a-c), 70(l-o), 72(a-e), 73(a-f, h), 74(a), and 75-78, filed on March 20, 2000. Objections to interrogatories DBP/USPS-42, 43, 57-58, 62, 67(d-e), 70(a-k), 71, 72(f-i), 73(g), 74(b-e), 75-76, and 80 were previously filed. Interrogatories DBP/USPS-44-45, 47-51, 52(a-d), 53-54, 56, and 69 have been redirected to witness Mayo. Interrogatories DBP/USPS-46, 52(e-f), 63, 68, and 79 have been redirected to witness Davis.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

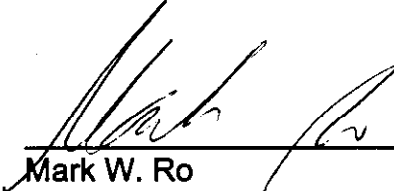
Daniel J. Foucheaux, Jr.  
Chief Counsel, Rate-making

  
\_\_\_\_\_  
Mark W. Ro

475 L'Enfant Plaza West, SW  
Washington, DC 20260-1137  
(202) 268-3231; Fax -6187  
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.

  
\_\_\_\_\_  
Mark W. Ro

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

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**DBP/USPS-55.** [a] How many of the mail processing facilities are now fully equipped with a device which will automatically "trap" a Certified Mail article by the presence of the phosphor ink on the Certified Mail label? [b] How many of the mail processing facilities are partially equipped with such a device? [c] How many of the mail processing facilities are not equipped with such a device? [d] What percentage of the mail is processed through a machine equipped with such a device. Note: Subparts [a] through [c] refer to the number of facilities and subpart d refers to the percentage of mail. [e] If there are any facilities listed in response to subparts b or c or if the response to subpart d is not 100%, provide an implementation schedule as to when that level will be achieved. [f] Confirm, or explain if you are unable to do so, that if there are any facilities which do not have such a device installed then there is an increase in the likelihood that the mailer may not receive the Certified Mail service that was requested. [g] If your response to subpart f is negative, then what purpose is achieved by installing these devices? [h] If you are able to confirm subpart f, explain how the failure to have all facilities equipped with this device can be reconciled with providing a quality service with value to the mailer.

**RESPONSE:**

Please see the response of witness Kingsley to interrogatory DFC/USPS-T10-8. Note that implementation of detectors is complete on all of the barcode sorters that do DPS processing.

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

**Response:**

- a) The Postal Service does not track these items separately; please see the response to OCA/USPS-T9-30, redirected to the Postal Service. Also, please see the response to OCA/USPS-T9-31 regarding how such profits are taken into account.
  
- b) Please see the response to OCA/USPS-T9-31.

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DAVID B. POPKIN**

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

**Response:**

- a) For each of the past five years, the total revenue and expenses for International Mail can be found in the Cost and Revenue Analysis report. These reports are available for the years requested in the Postal Service Library, L'Enfant Plaza SW, Washington, DC 20260.
- b & c) In general, the Postal Service does not track revenue and expenses for the sale of the various items of merchandise as defined in the question. For those items that are separately tracked though, please refer to USPS-LR-I-248.

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**DBP/USPS-61** With respect to the Philatelic Products, [a] for each of the past ten years, what were the total revenue and expenses amounts related to it? [b] With respect to revenue amounts, what methods are utilized to determine the division of stamp sales between those that will be utilized to pay for mailing as opposed to those that will not be utilized? [c] What are the goals of the Postal Service with respect to the profit levels to be achieved from the sale of Philatelic Products?

**Response:**

- a) Philatelic programs include the sale of stamps to collectors and the sale of other philatelic products. Postal Service accounting reports do not provide sufficient information to precisely determine the total revenues and expenses that result from philatelic programs. For example, revenue from sale of stamps is not separated in accounting records between the amount that is to be used for postage and the amount that is to be saved by collectors. Also, printing and window service labor costs related to philatelic stamp sales are not available from Postal Service accounting records and reports. Estimates based on samples and the accounting information that is available are provided in the Comprehensive Statement on Postal Operations, copies of which are available in the Postal Rate Commission library and the Postal Service library.
- b) Stamp Services uses a sampling system called the Household Tracking Index (HTI) to estimate the number of stamps that are purchased within each household, and out of this total how many are used for postage or saved by collectors. Each quarter a self administered questionnaire is mailed to a total of 50,000 households. Selected households are provided with visual replications of approximately 9 stamp issues, and asked specifically how many of each stamp issue they have retained or might retain for non-mailing purposes. On average, roughly 35,000 households complete and return the questionnaire.
- c) The Postal Service's goal with respect to philatelic programs is to generate as much net revenue as is practicable.

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DBP/USPS-65

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

RESPONSE:

- (a) Confirmed. And it can be completed before the carrier leaves the office, by riffling through trayed mail, scanning the indicia, and examining letters which, to the naked eye, are thick enough to warrant a closer examination to determine if they weigh more than one ounce and require additional postage.
- (b) No analysis of the accuracy of any scales that letter carriers might possibly carry with them has been conducted.
- (c) For most mail pieces, weight is a factor affecting postage. However, there are exceptions, like postcards.
- (d) In the past 30 years, there have been more than a few. The exact number is immaterial.
- (e) The Postal Service has not conducted an analysis which indicates the degree to which carriers "have the values of each of the non-denominated stamps with them". Except in the rarest of circumstances, they are presently unlikely to encounter any non-denominated stamps other than the "H" stamp and the Breast Cancer Awareness Stamp.

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Response top DBP/USPS-65 (continued)

- (f) Carriers can use templates to determine whether First-Class Mail pieces are nonstandard. Also, see the response to parts (a) and (c).
- (g) There are numerous instances when a carrier's experience and judgment can provide a basis for determining when to check a First-Class Mail letter to determine if additional-ounce postage is necessary. The surest way of distinguishing between letters weighing 0.9 ounces and 1.1 ounces is to weigh them.
- (h) One would expect that such an unlikely occurrence would stop the letter carrier in his or her tracks and so overwhelm that employee with curiosity that they would do whatever it took to satisfy themselves that the postage was proper.
- (i) Current plans do not include the use of a non-denominated basic rate First-Class Mail rate designated by a letter (A,B,C, etc.) for R2000-1 rate implementation. See response to OCA/USPS-62.
- (j) No.



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**DBP/USPS-67:** [a] Confirm that Postal Operations Manual Exhibit 125.22 [Issue 8 7/16/98] and Domestic Mail Manual Exhibit G011.1.5 [Issue 55 1/10/00] both show level of service that is provided on holidays and the day[s] before and/or after the holiday. [b] What is the significance, if any, that the definitions for Holiday and Sunday are not shown in the POM Exhibit? [c] Confirm that, while the DMM version allows a District Manager to authorize any exceptions to the level of service, the POM version requires that exceptions be approved by the Chief Operating Officer and Executive Vice President and therefore would be the controlling requirement. [d] Provide a listing of the exceptions, if any, that have been approved by the Chief Operating Officer and Executive Vice President in the past three years. [e] Explain and discuss any items that you are unable to confirm.

**RESPONSE:**

[a] Confirmed

[b] The Postal Service is currently unaware of any significance of the omission of those definitions from the POM Exhibit.

[c] Confirmed; however, the DMM appears to be correct. No exceptions have been approved by the Chief Operating Officer and Executive Vice President.

[d-e] Objections filed.

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**DBP/USPS-70:** In regard to the Service Commitments / performance goals for First-Class Mail, with regard to the delivery standards realignment that took place as a result of Docket N89-1 along with the experimental [which became permanent on September 23, 1989] realignment that took place prior to that in the Metropolitan New York City area, what percentage of the mail profile prior to that Docket and experiment shifted from [a] one-day to two-day delivery, [b] one-day to three-day delivery, [c] two-day to one-day delivery, [d] two-day to three-day delivery, [e] three-day to one-day delivery, and [f] three-day to two-day delivery? [g] What were the purposes of this realignment? [h] Did this realignment result in an increase in or a savings of costs associated with the mail processing and transportation [or any other areas]? [i] If so, provide the yearly change in costs for each year since the change. [j] Did this realignment result in a change in the consistency of mail delivery? [k] If so, provide the data for each year since the change. [l] Have there been any changes in delivery standards since this experiment/docket? [m] If so, enumerate them. [n] Is there a specific request to the mailing public at regular intervals to inquire about potential changes desired in delivery standards? [o] If so, explain and provide details. If not, explain why not.

**RESPONSE:**

[a-k] Objection filed on March 30, 2000.

[l-m] No changes of national significance have taken place.

[n-o] No. There has been no determination that the Postal Service needs to establish special procedures to solicit such suggestions from a general public which routinely communicates with the Postal Service concerning the full range of delivery issues.

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**DBP/USPS-72:** [a] Confirm in general that air transportation will be more costly than surface transportation. [b] Confirm in general that air transportation will provide more expeditious service than surface transportation. [c] If not, explain. [d] Is air transportation utilized in all instances where it would advance the delivery time for First-Class Mail by one or two days over that which may be obtained by utilizing surface transportation in whole or in part? [e] If not, why not and explain how the handling of this mail could be considered to be handled expeditiously. [f] Provide copies of any regulations, directives, or memoranda issued at Area or above level which specify when to utilize air transportation service. [g] Provide copies of any press releases, directives, or other memoranda which were issued at the Headquarters level to indicate the level of service that would be provided to First-Class Mail at the time that Air Mail was eliminated as a separate domestic service some twenty years ago. [h] Does the level to which air transportation is utilized today match the level that was stated when Air Mail was eliminated as a separate service? [i] If not, explain how and why it does not.

**RESPONSE:**

[a] Confirmed.

[b] Not Confirmed.

[c] There are instances when surface transportation is both more consistent and more expeditious than air. This is a function of factors such as distance, air line schedules, air carrier capacity, etc.

[d] No.

[e] The Postal Service chooses its transportation based on service commitment and cost.

[f-i] Objection filed on March 30, 2000.

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**DBP/USPS-73:** In regard to the Service Commitments / performance goals for First-Class Mail, [a] do the delivery standards apply to all types of First-Class Mail regardless of whether it is a letter, card, parcel, flat, or other shape or type? [b] Do the delivery standards apply regardless of the method by which the article is addressed such as printed vs. handwritten? [c] Do the delivery standards apply regardless of whether the article has no ZIP Code or a 5- or 9- digit ZIP Code? [d] Do the delivery standards apply regardless of whether or not the article contains a 5-, 9-, or 11-digit barcode applied by the mailer? [e] Do the delivery standards apply regardless of any other services that are utilized such as Certified Mail, Registered Mail, COD, Insured Mail? [f] Do the delivery standards apply whether or not the postage is paid by stamps which require cancellation or by some other means, such as a postage meter, which does not require cancellation. [g] Are the EXFC results broken out by any sub-scores for different characteristics of mail as noted in subparts a through f above? If so, provide results for the most recent period. [h] Elaborate and explain any negative answers.

**RESPONSE:**

[a] Yes, delivery standards are based strictly on Class, the ZIP Code of origin, and the ZIP Code of destination.

[b] Yes. Refer to [a] above. The address format makes no difference to the delivery standard.

[c] Yes. Refer to [a] above. The presence or absence of a ZIP Code, or whether the ZIP Code is 5 or 9 digit makes no difference to the delivery standard.

[d] Yes. Refer to [a] above. The presence or absence of a barcode, or the type of barcode, does not affect the delivery standard.

[e] Yes. Refer to [a] above. None of these special services affect the delivery standard.

[f] Yes. Refer to [a] above. Mail piece indicia does not affect the delivery standard.

[g] Objection filed on March 30, 2000.

[h] Not applicable.

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**DBP/USPS-74:** [a] Is mail addressed to a government agency in Washington DC [ZIP Codes 202 through 205] included in the EXFC results for Washington DC? [b] If not, why not? [c] Have any studies been completed in the past three years to evaluate the delivery service to these agencies? If yes, please provide copies. If not, why not? [d] What special methods, if any, are utilized to process mail to these agencies. [e] Is the Postmaster at Washington responsible for the delivery of mail to these agencies? If not, please provide the name, title, and address of the responsible individual.

**RESPONSE:**

[a] No.

[b-e] Objection filed on March 30, 2000.

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DBP/USPS-75 [a] Does the USPS have a requirement that all mail which is placed into the system on a given day will be postmarked that day and will be processed that same day? [b] Does the USPS have a requirement that all mail turned in over a service window that is open to the public will be postmarked that day and will be processed that same day? [c] Does the USPS have a requirement that all mail turned into a city delivery, rural, or HCR carrier or which is collected by a carrier will be postmarked that day and will be processed on that day? [d] Does this apply to all delivery dates including Saturday? [e] Explain and elaborate on any negative answers.

**RESPONSE:**

- a. No, see b. below.
- b. No, see the response to DFC/USPS-6.
- c. Although the Postal Service would normally seek to conform its operations to this objective to the extent possible, no such requirement has been identified.
- d. Yes.
- e. See above.

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DBP/USPS-76 [a] Are POM Sections 322.233 and 322.343 [Issue 8 7/16/98] still current with respect to the requirement for at least one collection on Sundays and holidays? [b] If not, provide a copy of the latest version as well as copies of any Headquarters directives or memoranda related to any changes. [c] To what extent would elimination of Sunday collection and mail processing have on the processing and delivery of First-Class Mail? [d] Would this result in any reduction or additional costs? [e] If so, elaborate and enumerate. [f] If Sunday and holiday collections and mail processing have been eliminated, are there any plans to resume them? [g] If so, explain and elaborate.

**RESPONSE:**

- a. No.
- b. The operative policy is set forth in the 1988 memorandum attached to the response to DFC/USPS-3.
- c.-e. In conformance with the 1988 memorandum, regular Sunday collections and mail processing have been eliminated since 1988.
- f.-g. There are no plans to resume them.

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**DBP/USPS-77:** [a] Provide a definition and description of the type of mail service that is provided to a "no office" point in Alaska. [b] Compare the level of service that is provided for mail addressed to one of these delivery points compared to that which is provided at a post office. [c] May all classes of mail be sent to one of these delivery points? If not, provide exceptions. [d] May all classes of mail be sent by a person utilizing this level of service? If not, provide exceptions. [e] What is the address format for mail destined to one of these no office points? Please provide a specific address utilizing generic designators as John Doe for a name and 99XXX for a ZIP Code, etc. [f] Is the ZIP Code utilized for a no office delivery point unique to one or more no office points or is it shared with other address points that are not served in this manner?

**RESPONSE:**

[a] The term "No-Office Point" is used to describe the special mail service to communities without any postal facilities where the Postal Service assumes responsibility only for the transportation of mail to the community.

The "No-Office Point" communities initially were identified by the Civil Aeronautical Board as needing essential airline service. They were too small to have a post office, but agreements were made with the village/community leaders to have the airline carrier drop mail to a central location and the community took responsibility for the mail delivery.

To provide some accountability for the mail, we developed agreement forms for the communities to file with the administrative post office. A named caretaker of the mail was required for the airline carrier to release the mail, or a locked container was needed for the carrier to deposit the mail.

No-Office point service became the best alternative for providing service to small Alaska settlements when a considerable number of people would be seriously inconvenienced if required to travel an unreasonable distance to receive and deposit mail.



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Response DBP/USPS-77 (page 2 of 5)

[b] The airline schedule determines the level of service to a no-office point. Airline schedules actually determine the level of service to most Alaskan communities, whether they have a regular post office or a contract postal unit. For example, prior to one airline carrier going out of business in the Ketchikan area, most of the no office points received 5 to 6 day a week service. We have regular post offices that receive less service.

Under the Airline Deregulation Act, the Civil Aeronautics Board established "essential service" which the Postal Service considers the service standards for these communities. The essential service stated that a community should not receive a level of service less than that which existed during calendar year 1976, or two round trips per week, whichever is greater. No-office points established after 1980 did not have such guarantees unless they petitioned the FAA and were approved for essential service. For those new points, the Postal Service agreed to send mail to the community as long as they had a certificated airline carrier serving them. Once the certificated carrier left, the Postal Service discontinued the no-office point service.

[c] We do not send accountable and signature mail to no-office points. The administrative post office holds this mail and sends a notice of arrival to the community. Some communities authorize the airline carrier to pick up the mail by signing the forms authorizing the post office to dispatch the mail on the next scheduled trip.

Response DBP/USPS-77 (page 3 of 5)

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[d] Since no-office points do not have postal facilities, they use stamps for any mail going out. Some send money with parcels to be mailed at the administrative post office. The receipts and change is usually sent back to the customer on the next trip. In some cases, the community gives the funds and mail to the airline carrier who does the mailing for the customer.

[e] Prior to the automation age, no-office points used the following address format:

John Doe  
Chulitna via McGrath AK 99627

During the mid 80's when we began implementing the ZIP+4 Program and standardizing addresses, we had to change the format. Since the no-office points were not postal facilities, they did not list in the National Zip Code Directory. Mailers had the blues trying to match the no-office point addresses to the ZIP Code.

We redesigned an addressing system to ensure the mail for no-office points could reach the communities without delay. To do so required the mail to reach the administrative post office without delay. Thus, we used the no-office point community's air stop code as a special post office box address for the community. We entered the box number in post office products which allowed mailers to match the address. Shown below is the addressing format we implemented and sent to all authorized no-office points:

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Joshua C McCoy  
Deep Bay  
PO BOX DPB  
Ketchikan AK 99950-0030

This format allowed the mail to flow directly to the Ketchikan Post Office. The "DPB" is the airstop code for Deep Bay that the post office places on mail destined for the community. This annotation is well known in the dispatch operations. Upon arrival, the distribution clerks could separate the mail promptly to the no office points and make dispatch schedules.

In fact, without this change, our no-office point customers would have severe mail delivery problems. We have weathered the automation storm and our customers have not suffered from mail delivery issues. Their largest headaches come from the changing airline industry.

[f] Back in 1979, the Postal Service had several unique ZIP Codes established for the no-office points. At that time, there were approximately 230 communities considered for essential air service where the government assured that they would not lose air service. Prior to program, there were no guarantees that the communities would receive a particular level of service from the carriers serving them. The Postal Service ZIP Codes for the no-office point communities were:

99695 - established for the no-office points served out of Anchorage

99696 - established for the no-office points served out of Bethel

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99697 - established for the no-office points served out of Kodiak

99790 - established for the no-office points served out of Fairbanks

99850 - established for the no-office points served out of Juneau

99950 - established for the no-office points served out of Ketchikan

This concept worked well prior to the automated postal sortation equipment. The small mail volume per community, the changing airline schedules, and the distribution scheme system made it impractical for the large offices to process the mail efficiently. These obstacles led to the addressing change discussed in (e) above. By moving the no-office points to the post office that actually made the dispatch to the community, the large post offices could process Alaska mail by ZIP Code. After the realignment, a few communities still were required to use the unique ZIP Codes since their only airline transportation came from the large offices.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
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**DBP/USPS-78 .**

With respect to Express Mail tracking, [a] Indicate the points at which an Express mail article will be scanned, in the format of "acceptance at the mailing office", "arrival at the delivery office", etc. Distinguish between those points that are required and those that are optional. [b] How often and at what times are the results of the scan uploaded so that the information will be available to the public on the telephone or website? If necessary, provide separate information for different days of the week or otherwise.

**RESPONSE:**

(a) Express Mail receives a mandatory scan when it is accepted from the mailer at the post office or from collection boxes. Express Mail receives a mandatory scan when it arrives at the delivery unit, when it is attempted in the box section, when it is undeliverable as addressed, or when it is delivered at the retail counter or firm section. Express Mail receives a mandatory scan when the carrier delivers, attempts delivery or leaves a notice for a mailpiece. It is also scanned if the mailpiece is refused or undeliverable as addressed.

Express Mail receives an optional enroute scan when it arrives at the mail processing unit and when it is dispatched from the mail processing unit. This scan is only done if it will not delay or miss the scheduled transportation. When manifest or large mailings are accepted, the documentation is scanned for acceptance.

Express Mail is scanned whenever it is redirected for the following reasons: forwarded, mis-sent, returned to sender, no such number, insufficient address, moved left no address, forward expired, addressee unknown, vacant, unclaimed, or the recipient is deceased.

(b) Acceptance scans are uploaded once per day when the office closes out and transmits its financial data to our accounting systems. Delivery scan data is uploaded every time the scanner is placed in its cradle. Generally, this happens when carriers finish their route and return to the office. This data is available on the IVR (Integrated Voice Response System) and the website within minutes of transmission.