

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on Sunday
and Holiday Collections

Docket No. C2001-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CARLSON INTERROGATORIES DFC/USPS-1 - 18
(June 12, 2001)

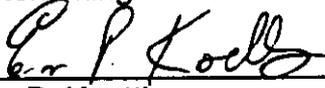
DFC/USPS-1 - 18 were filed on May 21, 2001. The Postal Service requested and was granted an extension of time to file objections until June 8, 2001, and to file answers until June 12, 2001. P.O. Ruling No. C2001-1/2 (June 4, 2001). On June 8, the Postal Service filed partial objections to questions 10 and 12. The Postal Service hereby provides its responses to DFC/USPS-1 - 18. Each interrogatory is stated verbatim, and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel
Ratemaking



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Attorney

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Washington, D.C. 20260-1137
(202) 268-2992/ FAX: -5402
June 12, 2001

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-1. Please confirm that, from some collection boxes, the Postal Service sometimes collects and processes outgoing First-Class Mail on some holidays even though the collection-times labels on the collection boxes do not indicate a holiday collection time. If you do not confirm, please explain.

RESPONSE:

The Postal Service confirms that it is likely that the situation described in this question does occur. Field managers have been instructed to indicate a holiday collection time on the box label only if mail from the box is collected and processed every holiday. See attachment to the response to DFC/USPS-3. As a result of this instruction, current labels on nearly all collection boxes correctly do not indicate a holiday collection time. Nevertheless, even when mail from the box is not collected and processed on every holiday, there may be one or more holidays during the year when mail is collected and processed. These circumstances could lead to the situation described in this question.

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DFC/USPS-2. Please confirm that some collection boxes show a holiday collection time even though, on some holidays, stamped First-Class Mail deposited in those collection boxes prior to the posted holiday collection time will not be cancelled, sorted, processed, and dispatched on those holidays. If you do not confirm, please explain.

RESPONSE:

Although the Postal Service confirms that the situation described in this question may occasionally occur, it would normally not occur if collection boxes were labeled in accordance with instructions. As noted in response to DFC/USPS-1, the field has been instructed not to indicate a holiday pickup on the collection box label unless mail from the box is collected and processed every holiday. For that reason, nearly all collection boxes do not indicate any scheduled holiday pickup, and the situation described in this question cannot occur with respect to those boxes.

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DFC/USPS-3. Please provide copies of all documents issued from Postal Service headquarters that guide field offices on the proper circumstances under which holiday collection times should be posted on collection boxes.

RESPONSE:

The only known responsive document, dated September 30, 1999, is attached.



September 30, 1999

MANAGERS, DELIVERY PROGRAMS SUPPORT (AREA)

SUBJECT: Displaying Sunday and Holiday Collection Times

I am receiving both inquiries and complaints from customers concerning the pick up times displayed on some of our collection receptacles for Sundays and holidays.

When a pick up time is displayed for either a Sunday or holiday, it is an indication to our customers that mail will be collected from the receptacle every Sunday and holiday throughout the year, canceled, processed, and dispatched to its intended destination. While the mail may in fact be collected as per the displayed schedule (to prevent overflow or to advance availability on the next processing day), it is not always sent to the processing plant for cancellation, processing, and dispatch on a Sunday or holiday.

To clear up this situation, those offices which collect mail from receptacles on Sundays/holidays where the mail is not canceled, processed, and dispatched that same day must immediately remove displayed collection pick up times for Sunday and holidays from the Collection Times decals (DEC's 54-D, 55-B and 55-H) on all collection receptacles. Even though no time for Sundays/holidays is displayed on the receptacle, collections should continue to be performed to prevent overflow or advance availability for the next processing day. For those offices which collect mail from receptacles on Sundays/holidays where the mail is canceled, processed, and dispatched that same day, no change to the times displayed on the Collection Times decal is required.

Any questions concerning this clarification may be directed to _____ at _____

Thank you in advance for your attention to this matter.


W. J. Bothwell
Manager

Delivery Policies and Programs

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DFC/USPS-4. Please confirm that Postal Service headquarters does not issue signs or other preprinted informational notices to post offices for them to use to advise customers, in advance of and on each holiday, whether outgoing First-Class Mail will be collected and processed on the holiday and, if so, the final collection time at the post office on the holiday. If you do not confirm, please provide copies of the signs or other preprinted informational notices.

RESPONSE:

Confirmed.

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DFC/USPS-5. Please confirm that Postal Service headquarters does not issue signs or other preprinted informational notices to post offices for them to use to advise customers that the final collection on the day before a holiday will be made prior to the posted collection time for the day of the week corresponding to the day prior to the holiday. If you do not confirm, please provide copies of the signs or other preprinted informational notices.

RESPONSE:

Confirmed.

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DFC/USPS-6. For each of the following holidays, please provide information that is as specific as possible to describe the number and proportion of mail-processing facilities nationwide that presently process outgoing First-Class Mail on the holiday:

- a. New Year's Day;
- b. Martin Luther King, Jr.'s Birthday;
- c. George Washington's Birthday;
- d. Memorial Day;
- e. Independence Day;
- f. Labor Day;
- g. Columbus Day;
- h. Veterans Day;
- i. Thanksgiving Day;
- j. Christmas Day.

For purposes of this interrogatory, "outgoing First-Class Mail" refers to First-Class Mail that customers deposit for collection, not, for example, forwarded, return-to-sender, or missent mail. "Outgoing First-Class Mail" does not include mail deposited at a business mail entry unit or other facility designed to accept large mailings that may be presorted or bear permit imprints.

RESPONSE:

There is no static list which identifies facilities that "presently" process on each holiday, and according to which each facility will or will not process on each holiday until the list is changed. The determination to process or not in each facility can vary year-by-year and holiday-by-holiday. Therefore, the most responsive information that the Postal Service can provide is to describe the number and proportion of mail-processing facilities nationwide, of those for which information was reported, that show non-zero cancellation volumes for the most recent occurrence of each of the specified holidays.

a. New Year's Day, 2001

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| | |
|---------------------------|----------------|
| b. Dr. King Holiday, 2001 | 179 out of 350 |
| c. Presidents' Day, 2001 | 176 out of 350 |
| d. Memorial Day, 2001 | 33 out of 351 |
| e. Independence Day, 2000 | 27 out of 349 |
| f. Labor Day, 2000 | 40 out of 350 |
| g. Columbus Day, 2000 | 189 out of 351 |
| h. Veteran's Day, 2000 | 108 out of 341 |
| i. Thanksgiving Day, 2000 | 17 out of 349 |
| j. Christmas Day, 2000 | 6 out of 349 |

This information is derived from the material provided in response to DFC/USPS-10.

Note that the above totals, however, include facilities like AMFs and PMPCs that consistently show zeros because they are not intended (and lack the machines) to perform the cancellation operation. Omitting those facilities would increase the above proportions, but the pattern of variation between holidays would be essentially the same.

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DFC/USPS-7. For each of the holidays described in DFC/USPS-6 for which any mail-processing facilities process outgoing First-Class Mail (as First-Class Mail is defined in DFC/USPS-6):

- a. Please describe the nature and type of communications that post offices receive indicating whether First-Class Mail collected from collection boxes under their jurisdiction will be cancelled and sorted on that holiday;
- b. Assuming the collection boxes do not show a holiday collection time, please explain how post offices determine whether to collect mail from street collection boxes, whether to collect mail from all street collection boxes or only a subset of the boxes, and, if collections will be made, the time at which to collect mail from collection boxes.

RESPONSE:

a. Because the determination to process outgoing mail or not on any particular holiday is usually made at the local level, the communications received by post offices would tend to be local in nature, and would be of the type determined locally to be most suitable for the conveyance of such information. As a result, it is expected that there could be a wide range of variation in such communications.

b. There are two types of circumstances under which post offices collect from boxes (with no posted holiday pickup) on holidays. The first circumstance would be if there were no outgoing processing, but the boxes were swept in order to avoid overflow. In that circumstance, post offices would follow the instructions (found in virtually any of the memos filed as Attachment B to the Postal Service's November 27, 2000 Answer) discussing which types of boxes need to be swept for that purpose. The timing of the collections would be set locally in order to balance the dual objectives of avoiding overflows and using staff resources most efficiently.

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The second potentially relevant circumstance would be if the mail were actually being collected for outgoing processing on the holiday. One common reason why outgoing mail might be processed on a holiday would be to avoid the accumulation of more outgoing mail on the day after the holiday than can be timely processed. In situations in which mail is being processed on holidays, the location of the boxes collected and the timing of those collections would be set locally in order to balance the dual objectives of getting mail to the outgoing operations on a timely basis and using staff resources most efficiently.

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DFC/USPS-8. For every holiday in every year from 1987 to present, please provide all documents stating Postal Service policy, guidance, or recommendations for deciding, or establishing criteria for deciding, whether the field offices should or will collect and process outgoing First-Class Mail from collection boxes.

RESPONSE:

A search of Headquarters files has located primarily the memorandums to the field distributed by Headquarters for each holiday in recent years. Attachment B to the Postal Service's November 27th Answer contained copies of all of those memos for calendar 1999. With respect to years other than 1999, the files contain only memos going back to June of 1998, and those for the period since 1999. Copies of all of those materials (including what was originally provided in Attachment B) are provided as Library Reference USPS-LR-C2001-1/1. For periods prior to June of 1998, the recollection is that such Headquarters memos, if distributed at all, were not distributed as regularly as in the period since 1998. Supporting this recollection are copies of Headquarters memos, one each for Fiscal Years 1995 and 1996, intended to cover all of the holidays in each of those years. Those memos, also included in Library Reference 1, suggest that holiday-specific memos were not expected to be distributed in those years. The only other materials located were Field Instructions for the July 4th Holiday that were included in the Postal Bulletin in 1987 and 1992, and copies of those items are also included in Library Reference 1. Additional material that potentially might be of interest, however, may be found in the material provided in response to DFC/USPS-11.

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DFC/USPS-9. Please provide all documents explaining why fewer mail-processing facilities cancel and process outgoing First-Class Mail on holidays in 2001 than in years prior to 1988.

RESPONSE:

The Postal Service is unaware of any documents that specifically address, much less purport to explain, why fewer mail-processing facilities cancel and process outgoing First-Class Mail on holidays in 2001 than in years prior to 1988. The matter is, at most, one of purely academic interest.

In that vein, however, it may be worth noting that prior to 1988, the Postal Service routinely collected and processed outgoing mail every day of the week, including Sundays. Sundays have traditionally been the one day of the week that mail is not delivered. After the elimination of routine Sunday collection and processing in 1988, it is possible that the mailing public implicitly began to associate collection and processing operations with days in which they receive delivery. In that case, the fact *the holidays are days in which mail is not delivered might have caused people to tend to deposit less mail on holidays.*

In many respects, this question poses a classic chicken-and-the-egg issue. It might be that the Postal Service conducts the operations in question on holidays less extensively now than in the past because there is less mail being deposited. The Postal Service suspects that lower volume probably is the primary cause. It is also possible, however, that reduced holiday operations have had an impact on the amount of mail being deposited, further reducing the need for holiday operations. Even if one is

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willing to enter the realm of speculation, it seems unlikely that the interaction of such effects could be disentangled with any reasonable degree of confidence. Perhaps more to the point, the mailing environment as it existed prior to 1988 is not the mailing environment of today, and the Postal Service focuses on addressing and resolving the issues that it must confront in today's world, not yesterday's.

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DFC/USPS-10. To the extent that information and data are available, for each holiday listed in DFC/USPS-6:

- a. Please identify, for each year between 1986 and the present, every P&DC and P&DF that cancelled and processed outgoing First-Class Mail;
- b. Please provide, for each year between 1986 and the present, the volume of First-Class letters that every P&DC and P&DF cancelled and processed.

RESPONSE:

No material responsive to this request for periods prior to 1992 was located. For periods from 1992 to the present, the available information is provided as Library Reference USPS-LR-C2001-1/2. This information comes from the Mail Condition Reporting System, which includes number of cancellations as a reporting field. To put the cancellation numbers in some perspective, and to avoid the disclosure of facility-specific volume information, the number reported for each facility for each holiday for each year is the ratio of the reported number of cancellations for that facility for that holiday for the year, to the average daily cancellations for that facility for FY 2000. This allows year-to-year comparisons for each facility for each holiday, and holiday-to-holiday comparisons for each facility.

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DFC/USPS-11. For the Pacific Area and Western Area, please provide all documents explaining why the number of mail-processing facilities that cancel and process outgoing First-Class Mail on holidays, or the number of holidays on which mail-processing facilities process First-Class Mail, dropped between 1997 and 2001.

RESPONSE:

The Postal Service is unaware of any documents that specifically address, much less purport to explain, why, for the Pacific Area and Western Area, the number of mail-processing facilities that cancel and process outgoing First-Class Mail on holidays, or the number of holidays on which mail-processing facilities process First-Class Mail, dropped between 1997 and 2001.

In an effort to go beyond what is expressly requested in the question, however, both Area offices were asked to provide copies of documents they could locate that they had generated and distributed to their areas with respect to holiday operations. The documents provided by the Pacific Area, redacted to omit facility-specific information, are provided as Library Reference USPS-LR-C2001-1/3. The apparent practice in the Western Area, however, is merely to pass along whatever guidance is issued by Headquarters, and leave implementation of that guidance to its subordinate units. Therefore, the Western Area had no documents corresponding to those provided by the Pacific Area.

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DFC/USPS-12. Please confirm that the P&DC in Oakland, California, cancelled and processed approximately 250,000 First-Class letters on Memorial Day in 1998. If you do not confirm, please explain.

RESPONSE:

It is the intended practice of the Postal Service in Commission proceedings not to disclose facility-specific volume information, and therefore your assertion is neither confirmed nor denied. Nationwide, however, the Postal Service will confirm that there were several facilities which reported cancellation volumes in that general order of magnitude for Memorial Day, 1998.

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DFC/USPS-13. Please confirm that the practice of making the final collection from collection boxes on Christmas Eve prior to the posted collection time for the day of the week that corresponds to Christmas Eve has occurred in years other than 1999. If you do not confirm, please explain.

RESPONSE:

Given the size and scope of postal operations, it is not surprising that the practice described has occurred in some locations in years other than 1999. See the response to DFC/USPS-14. The Postal Service is unaware, however, of any year other than 1999 when that practice was expressly authorized by Headquarters. (Christmas Eve fell on a Friday on 1999.) Therefore, the known instances of occurrence in years other than in 1999 are far fewer.

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DFC/USPS-14. For Christmas and other holidays, please discuss the extent to which the final collection from collection boxes on the day before the holiday occurs prior to the posted collection time for the day of the week that corresponds to the day before the holiday.

RESPONSE:

The Postal Service believes that the practice described is relatively uncommon. As has been discussed in other contexts, the practice was authorized by Headquarters for Friday, Christmas Eve, 1999. The Headquarters memo for the Fourth of July holiday in 2000 likewise authorized offices, if the public was appropriately notified, to collect on a Saturday schedule on the 3rd of July, which was on a Monday that year. These are the only known instances expressly authorized by Headquarters.

In order to attempt to be able to discuss this matter in more concrete terms, two modes of inquiries were initiated. The first was to examine the files of the Headquarters office which is the exclusive channel for all requests for adjustments to the EXFC testing schedules because of local adjustments to collection schedules. See the response to DFC/USPS-19 for a description of this procedure. The retained files in that office only go back several years. Many of the documents relate not to Federal holidays, but to local festivals, fairs, or other special events for which expected crowds and street closures will make specific collection boxes and/or entire post offices inaccessible for the duration of the event. With respect to Federal holidays, the files support the above statement that early collections on the eve of holidays are relatively uncommon.

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For example, for the Christmas/New Years holiday period in 1998, 14 notices with respect to early pickups on holiday eves were filed, from Providence RI, Triboro (NY) District, Detroit MI, Albany NY, Boston MA, Capital Metro, Baltimore MD, Northern VA, Houston TX, San Antonio TX, Middlesex MA District, Dakotas District, Connecticut District, and Northland (MN) District. As might be expected given the circumstances of those holidays in 1999 (i.e., both eves on a Friday), that number doubled to 28 notices, from the Greater Michigan District, Central Illinois District, Royal Oak MI, Appalachian (WV) District, Baltimore MD, Capital Metro, Northern VA, Dakotas District, Northland (MN) District, Central New Jersey District, Long Island (NY), Northern New Jersey District, Triboro (NY) District, Albany NY, Boston MA, Connecticut District, Middlesex (MA) District, SE New England, Western NY District, Atlanta GA, South Florida District, Dallas TX, Louisiana District, Rio Grande District, Colorado/Wyoming District, Las Vegas NV, Seattle WA, and Spokane WA. In contrast, in 2000, no notices were received for Christmas Eve or New Year's Eve, presumably because those days fell on Sundays, and no collections were scheduled anyway. (In 2000, however, two notices were received with respect to advanced collections on the Saturdays which were the days before Christmas and New Year's Eve, from Royal Oak MI and the Appalachian (WV) District.)

With respect to the Fourth of July, only one District, Triboro in NY, shows up in the files as moving its collections on Monday, July 3, 2000, to a Saturday schedule. Others may have done so, but no such records have been found in the Headquarters files. With respect to all Federal holidays other than Christmas/New Years and

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Independence Day, there are no Headquarters records of any advancement of collections on the day before those holidays.

The second line of inquiry made was to contact the field communication offices and ask them to identify any instances of early collections on the eve of holidays in the last ten years. Phoenix AZ, Tuscon AZ, and Salt Lake City UT reported the suspension of collections on Christmas Eve 1996, Tuscon did the same in 1998, and Salt Lake City did the same in 1999. Houston TX suspended collections after noon on Christmas Eve, 1998, while the Capital Metro Area collected on a Saturday schedule on Christmas Eve of that year, and the Triboro District (New York, NY) collected on a Saturday schedule on Christmas Eve of 1999. The Spokane WA District suspended collections after noon on Christmas Eve of 1999, and post offices in Colorado and Wyoming suspended collections after 1 p.m. that year. These are the locations for which field communications independently reported deviations from posted collection schedules on holiday eves.

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DFC/USPS-15. When a post office, district, or area decides to perform the final collection from collection boxes on the day before a holiday prior to the posted collection time for the day of the week that corresponds to the day before the holiday, does the Postal Service believe that media announcements and other methods of communication normally used to communicate this information to the public effectively reach every person who may deposit a letter in a collection box before the posted time but after the final collection has, in fact, been made? If so, please explain the basis for this position. If not, does the Postal Service have any concern for the mailer whose mail may be delayed for two to three days as a result of the mailer relying on the posted collection time? Please explain.

RESPONSE:

It would seem unlikely that any form of communication would effectively reach "every" person who "may" deposit a letter under the circumstances described. Even a sign attached directly to the box would not communicate effectively to persons who might be routinely depositing mail in the box while preoccupied with other matters, who might be visually-impaired, or who might be unable to read English. Obviously, the Postal Service has concern for all of its customers, including those whose mail might be delayed under the circumstances described. Nevertheless, it is far from clear that a delay of two to three days under the circumstances described would necessarily be critical to most customers, or even to many customers.

The majority of the mailing public is aware that postal operations are affected by holidays. The majority of the mailing public is likewise aware, usually from personal experience, that a certain amount of variation in the time it takes for individual letters to reach their destinations is to be expected. Consequently, it does not seem unreasonable to anticipate that most mailers who deposit their mail late in the day on

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the eve of a major holiday either are not especially concerned with the time in which their mailpieces are delivered, or will tend to build in more of a cushion to accommodate routine holiday disruptions. (Mailers particularly keen to obtain less uncertain service, moreover, would likely be taking their mail to a retail facility, perhaps to use a premium service such as Express Mail.) Certainly, though, it is preferable that mailers be aware in advance of any revision of collection times, which is why the field is expressly directed to use the available media to publicize such occurrences.

The Postal Service is unaware of any reason to believe that mail delays caused by accelerated collections on the eve of holidays is a significant source of customer dissatisfaction. Even assuming, hypothetically, that some amount of customer dissatisfaction were to exist, it would need to be appropriately balanced against the potential operational benefits (e.g., reduced expenses, improved employee morale) which motivate this practice in those relatively rare instances in which it occurs.

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DFC/USPS-16. Please provide all documents explaining the Postal Service's policy toward permitting final collections on the day before a holiday to be made prior to the posted collection time for the day of the week that corresponds to the day before the holiday.

RESPONSE:

The Postal Service has no explicit policy regarding this practice because it is allowed only rarely, on a case-by-case basis. As a practical matter, authorization of such exceptions is only considered in those instances in which the configuration of the holiday makes it probable that collection mail volumes will be so minimal as to make routine operations in some locations plainly excessive. A good example is when Independence Day falls on a Tuesday. Most Americans will treat this circumstance as if it were a four-day holiday, and the amount of collection mail tendered on Monday, in the middle of this four-day period, simply may not justify the conduct of routine Monday operations in all locations. Under such circumstances, schedule alterations may be prudent in some places, as long as appropriate steps are taken to notify customers.

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DFC/USPS-17. Please provide all documents explaining the guidance that the Postal Service provides to field offices to communicate changes in collection schedules to the public for the day before a holiday when the field offices decide to make final collections prior to the posted collection time for the day of the week that corresponds to the day before the holiday.

RESPONSE:

Please see the attached memo dated November 16, 1999.

CONSUMER AFFAIRS



November 16, 1999

VICE PRESIDENTS, AREA OPERATIONS
MANAGER, CAPITAL METRO OPERATIONS

SUBJECT: EXFC and Holiday Operations

As the Christmas and New Year holidays approach, we would like to remind you of our policy concerning EXFC and holiday operations. While no adjustments can be made after the fact, when the public has been notified in advance, of a service suspension, PricewaterhouseCoopers will adjust their operations accordingly.

The District Manager or designee must ensure that the public is notified in advance of the curtailment of operations – including collections – via press and broadcast media if available. This notification must be specific as to times, dates, and locations (preferably by 5-digit, but 3-digit area will be acceptable). Documentation of the intended notification (such as draft press release, radio or TV script or other hard copy) must be sent to Lizbeth Dobbins, Manager, Customer Satisfaction Measurement, no later than 10 days prior to the actual curtailment (calculation excludes weekends). For the Christmas holiday, the last date to submit any changes in operations is Friday, December 10, 1999. For the New Year's holiday, the last date to submit any changes will be Friday, December 17, 1999. This information may be sent by FAX (202-268-6742), e-mail or mailed, but must include attachments showing the press release or script. The advance notice period is required in order to provide the vendor sufficient time to adjust test operations. Actual customer notification of curtailment in service may take place closer to the event.

All submissions should be consolidated by the district office for forwarding to Headquarters. Requests by individual post offices cannot be honored. If you have any questions, please call us at

A handwritten signature in cursive script, appearing to read "Lizbeth J. Dobbins".

Lizbeth J. Dobbins
Manager, Customer Satisfaction Measurement

cc: Mr. Lewis
Mr. Potter
Ms. Smith

475 L'ENTANT PLAZA SW
WASHINGTON DC 20260-2200
202-268-2284
202-268-2304

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DFC/USPS-18. Please provide all documents containing analyses or studies of the adequacy of the current level or any previous level of holiday collection and processing service for First-Class Mail.

RESPONSE:

The Postal Service has been unable to identify any studies specifically intended to analyze the adequacy of holiday collections and outgoing mail processing. What may be of interest along these lines, however, are some of the factors which local officials may take into account when planning for holidays. Those officials may examine levels of "plan failures" – instances in which facilities were unable to complete timely outgoing processing – which might have occurred on the day *after* a previous similar holiday. Examples may be found in the materials provided in response to DFC/USPS-11. Efforts to minimize such plan failures act to ensure the adequacy of holiday collection and mail processing service.

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

Douglas F. Carlson
P.O. Box 7868
Santa Cruz CA 95061-7868

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



Eric P. Koetting

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June 12, 2001