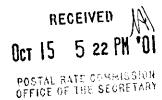


BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001



POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS-T36-1-7, 9-11, 14, 15(B-C), 17(A-G), AND 18)

The United States Postal Service hereby provides the responses of witness Mayo to the following interrogatories of the Office of the Consumer Advocate:

OCA/USPS-T39-1-7, 9-11, 14, 15(b-c), 17(a-g), and 18, filed on October 1, 2001.

Interrogatory OCA/USPS-8 was redirected to the Postal Service, and interrogatories

OCA/USPS-T36-12, 13, 15(a), 16, and 17(h) were redirected to witness Kingsley. The Postal Service also may file a partial objection to interrogatory OCA/USPS-T36-1(a), depending on the results of its review of Office of the Inspector General audit reports.

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, Ratemaking

David H. Rubin

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2986 Fax –6187 October 15, 2001

OCA/USPS-T36-1. The following questions refer to a United States Postal Inspection Service Special Services report, Case No. 040-1241887-PA(2) dated May 18, 1999, filed in Docket No. R2000-1 as USPS-LR-I-200.

- (a) Since the May 18, 1999, audit, has the Postal Inspection Service or any other entity under Postal Service auspices performed any other audits, studies, or updates on any Postal Service special service? If so, please provide a copy of any report or other document prepared as a result of such audit, study, or update.
- (b) Have the problems been resolved at the three District offices and five plants identified in USPS-LR-I-200 as having ongoing problems in their facilities with Certified Mail in relation to callers with direct holdouts receiving their certified letters without signing for receipt of the items? If so, please explain how each problem was resolved. If not, please explain:
 - (1) why the problem continues to exist;
 - (2) the volume of Certified Mail impacted in FY 2000 and in FY 2001; and
 - (3) when each problem will be resolved. Provide specific cites to all source documents referenced in preparing your response and include a copy of each source document if one has not been previously filed in this docket.
- (c) As noted in USPS-LR-I-200, customers received certified letters without signing for them. Does this problem continue to exist? If so, please explain why it persists, the conditions under which it occurs and provide the volume of Certified Mail impacted for FY 2000 and FY 2001. If the actual volume of Certified Mail impacted is unknown, please provide an estimate for FY 2000 and FY 2001. If the problem does not continue to exist, please explain when and how the problem was resolved. Provide specific cites to all source documents referenced in preparing your response and include a copy of each source document if one has not been previously filed in this docket.
- (d) As noted in USPS-LR-I-200, at 18, "plant managers were concerned that Certified Mail was bypassing the facility and going directly to the federal and state agencies without being documented." Does this situation continue to exist? If so, what volume of Certified Mail was impacted in FY 2000 and FY 2001, and why does the situation persist? If the situation does not continue to exist, please explain what was done to resolve the problem and when the problem was resolved.

OCA/USPS-T36-1 (CONTINUED)

RESPONSE:

- a. Yes. See the Postal Service's responses to interrogatories
 DFC/USPS-1 and 2, and the Notice of United States Postal Service of
 Review of Responses to Interrogatories DFC/USPS-1 and 2, filed October
 12, 2001.
- b. To the best of my knowledge, the problems at the three District offices have been fixed. The problems were fixed by instructing the plants on the proper procedures for scanning mail pieces into the computers, and by providing for appropriate staffing during periods leading up to tax filing deadlines.

OCA/USPS-T36-1 (CONTINUED)

RESPONSE:

- c. As indicated in my response to (b) above, I have been informed that the problems have been fixed. But, it is possible for a certified letter to be delivered without acquiring a signature. There is a very small chance that the taggant detector on a barcode sorter does not detect and extract the mailpiece from the Delivery Point Sequenced (DPS) letter mail, or the carrier does not see the certified mail letter when fingering the DPS mail to check for certified mail. The Postal Service does not measure how much certified mail is delivered without obtaining a signature.
- d. Not to my knowledge. The problems were addressed by instructing the plants on the proper procedures for scanning mailpieces into the computers, and by providing for appropriate staffing during periods leading up to tax filing deadlines.

OCA/USPS-T36-2. The following interrogatory refers to Certified Mail delivered to either a federal, state or local taxing authority.

- (a) When Certified Mail is delivered in bulk to a state, federal or local taxing office, please indicate how the Postal Service currently ensures that the appropriate signatures are obtained.
- (b) If signatures for Certified Mail are not obtained at the time of delivery, please explain why not.
- (c) Please identify and provide a copy of the form or forms used by the Postal Service to obtain a signature for the delivery of a single Certified Mail piece.
- (d) If multiple Certified Mail pieces are delivered to a federal, state or local taxing authority on a given day (i.e. during the annual/quarterly tax return filing season), does the carrier record each Certified Mail piece on a postal service form and obtain the appropriate signature at the time of delivery? If not, please indicate what procedures the carrier currently follows and estimate the volume of Certified Mail delivered in bulk to a taxing authority in FY 2000 and in FY 2001.
- (e) If signatures for Certified Mail are not actually being obtained at the time of delivery, please explain why not.
- (f) Please identify and provide a copy of each form used by the Postal Service to obtain a signature for delivery of multiple Certified Mail pieces.

RESPONSE:

a. The delivery unit employee first sets the Mobile Data Collection Device (MDCD) scanner to the "create firm sheet" mode. Each certified mail label barcode on each mailpiece is then scanned. When the scanner is placed in the cradle of the print workstation, a Firm Delivery Sheet, Postal Service (PS) Form 3883A, is printed out listing each scanned certified mailpiece.

OCA/USPS-T36-2 (CONTINUED)

RESPONSE:

a. (continued)

The Firm Delivery Sheet also has a barcode at the top electronically identifying the listed items. In the event the delivery unit is not equipped with a print workstation, the same scanning is completed in the "create firm sheet" mode and the certified numbers will be manually written on a preprinted PS Form 3883. The PS Form 3883, like the PS Form 3883A, also has a barcode at the top representing the listed items. This barcode is linked to each of the certified mailpieces. The carrier then takes the Forms 3849 and 3883 or 3883A, along with the certified mail, for delivery. During the delivery of the certified mailpieces, the tax office representative verifies that the Forms 3883 or 3883A match the mail being delivered. Because the Forms 3883 or 3883A list the pieces in the order that they are presented, the verification process is easy. The carrier then obtains a signature or an approved signature stamp from the tax office representative on the PS Form 3849, Delivery Notice/Reminder/Receipt.

OCA/USPS-T36-2 (CONTINUED)

RESPONSE:

a. (continued)

(The customer is provided a copy, but does not sign either the PS Form 3883 or PS Form 3883A.) After the signature is obtained, the carrier scans the barcode on the PS Form 3849, as well as the barcode on the PS Form 3883, thereby electronically linking the items listed on the PS Form 3883 with the signature on the PS Form 3849.

- b. Aside from human errors, there is no reason for not obtaining a signature at the time of delivery for certified mail.
- c. PS Form 3849 (attached) is used to capture signatures for up to five certified mailpieces.
- d. Yes. See my response to (a).

RESPONSE:

- e. See my response to (b).
- f. See PS Form 3883 (attached) and my response to (c).

e. Check all that apply in section 3;		, and enter agent's name here): POST OFFICE - 99999
b. Sign in section 2 below; c. Leave this notice where the center can see it.	l	DAKOTA AVE a.m 5:00 p.m. M-F
Sign Here to Authorize Redulivery or to Authorize on Agent to Sign for Your	1-10	11-555-0003 Delivery Section
3. Redeliver (Enter stay of week.):	Signature	Jane De
(Allow at least two delivery days for redshery, or out your post office to errorge delivery.) Leave items at rny address. (Specify where to leave. Designs.	Printed Name	Jane Doe
	Delivery Address	1185. Main St.
(operary writes to seale, Europer, "portri," richs don". This spiles is not available if box is observed on the frost requiring your alignature at time of delivery.) Refused	USF	s

		Bulk De	elivery Mail					
☐ Certified	Delivery Confirmation Service	☐ Express Ma	Recorded Delivery Registered	Return Receipt for Merchand		Mail for/Bill No.		
			Catholic In Decide No. 1 of Catholic March			f Office of Legal of Final		
1.				11.				
2 .				12				
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4.			-	 1 4				
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			<u> </u>					
	= Received in Dec	eged Condition.		= Return Receip	pt Requested. RE = Re-envel	loped. RW = Returned to Writer.		
Date of Delivery		Received the	Received By: (Print Name)			Postmark - Delivery Of		
Delivered By: (Clerid Carrier)		pieces described above	Signature of Addresses/ X Apent					
Form 3849 Barcon	de Number (# deliver	id using scanning opt			if using handheld scanner option, have recipient sign Form 3849.			

OCA/USPS-T36-3. The following excerpt comes from the IRS Publication 17, entitled "Your Federal Income Tax," for 2000 returns. "Your paper return is filed on time if it is mailed in an envelope that is properly addressed and postmarked by the due date. The envelope must have enough postage. If you send your return by registered mail, the date of the registration is the postmark date. The registration is evidence that the return was delivered. If you send a return by Certified Mail and have your receipt postmarked by a postal employee, the date on the receipt is the postmark date. The postmarked Certified Mail receipt is evidence that the return was delivered."

- (a) Are you aware of this IRS Publication 17 statement?
- (b) Given the IRS statement, do you agree that neither Delivery Confirmation nor return receipt is necessary to prove the filing date of an IRS tax return?

RESPONSE:

a. I was not aware of this statement until it was brought to my attention by this interrogatory.

OCA/USPS-T36-3. (CONTINUED)

RESPONSE:

b. I am not an attorney, but it appears from the IRS statement in Publication 17 that registered mail or certified mail (with the receipt postmarked by a postal employee), as stand-alone services, can provide evidence of delivery instead of Delivery Confirmation or a return receipt. I do not know if Delivery Confirmation or a return receipt might also be useful in a dispute with the IRS about whether a tax return was received. Delivery Confirmation or a return receipt also can provide peace of mind for a taxpayer who wants to know whether a tax return was delivered.

OCA/USPS-T36-4. For Certified Mail, please provide by fee category, the number of transactions and reported revenue generated by product sales during

(a) April 1, 2000 to April 15, 2000 and

(b) April 2, 2001 to April 16, 2001.

If you are unable to provide actual data, please provide an estimate. Provide citos to all source documents used in preparing your response and include a

cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in

RESPONSE:

this docket.

a. I am providing transactions and revenue for return receipts by fee category for accounting period 8 of FY 2000 covering the period from March 25 through April 21, 2000, the closest period to the requested date range. This information was obtained from the Revenue, Pieces, and Weight (RPW) system. The documentation for RPW is provided in Library References J-16, 18, 19, 20, 21, and 22.

Fee Category	<u>Pieces</u>	Revenue
Certified Mail	24,065,236	33,446,402
USPS Certified Mail	29,916	0

OCA/USPS-T36-4 (CONTINUED)

RESPONSE:

b. I am providing transactions and revenue for return receipts by fee category for accounting period 8 of FY 2001 covering the period from March 24 through April 20, 2001, the closest period to the requested date range. This information was obtained from the Revenue, Pieces, and Weight (RPW) system. The documentation for RPW is provided in Library References J-16, 18, 19, 20, 21, and 22.

Fee Category	<u>Pieces</u>	<u>Revenue</u>
Certified Mail	26,902,623	50,879,638
USPS Certified Mail	24,053	0

OCA/USPS-T36-5. For return receipts, please provide by fee category, the number of transactions and reported revenue generated by product sales during

- (a) April 1, 2000 to April 15, 2000 and
- (b) April 2, 2001 to April 16, 2001.

If you are unable to provide actual data, please provide an estimate. Provide cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.

RESPONSE:

a. I am providing transactions and revenue for return receipts by fee category for accounting period 8 of FY 2000 covering the period from March 25 through April 21, 2000, the closest period to the requested date range. This information was obtained from the Revenue, Pieces, and Weight (RPW) system. The documentation for RPW is provided in Library References J-16, 18, 19, 20, 21, and 22.

OCA/USPS-T36-5 (CONTINUED)

RESPONSE:

a. (Continued)

Fee Category	<u>Pieces</u>	Revenue
Basic Return Receipts for Registered	207,537	259,421
Basic Return Receipts for Insurance	126,057	157,248
Basic Return Receipts for Certified	20,534,220	25,527,507
After Mailing for Registered	0	0
After Mailing for Insurance	0	0
After Mailing for Certified	273,338	1,913,369
Return Receipt for Merchandise	147,566	206,593
USPS Return Receipts	33,330	0

b. I am providing transactions and revenue for return receipts by fee category for accounting period 8 of FY 2001 covering the period from March 24 through April 20, 2001, the closest period to the requested date range. This information was obtained from the Revenue, Pieces, and Weight (RPW) system. The documentation for RPW is provided in Library References J-16, 18, 19, 20, 21, and 22.

OCA/USPS-T36-5 (CONTINUED)

RESPONSE:

b. (Continued)

Fee Category	<u>Pieces</u>	<u>Revenue</u>
Basic Return Receipts for Registered	145,741	218,600
Basic Return Receipts for Insurance	106,446	159,669
Basic Return Receipts for Certified	22,008,485	32,988,813
After Mailing for Registered	0	0
After Mailing for Insurance	0	0
After Mailing for Certified	377,855	1,322,494
Return Receipt for Merchandise	88,069	206,359
USPS Return Receipts	163,051	0

OCA/USPS-T-36-6. In your testimony at 24, you state, "Certified mail is an ideal vehicle for customers wishing to send mail. It is used frequently by law firms, tax municipalities, police departments, banks, mortgage institutions and real estate companies for important documents." Also, you note that in FY 2000, 84 percent of all Certified Mail articles had return receipts attached to them.

- (a) Please provide the derivation of the 84 percent figure you reference. Provide cites to all source documents used in preparing your response and include a copy of each document referenced if one has not been previously filed in this docket.
- (b) For FY 2000 and FY 2001, please provide an estimate of the total transactions and the revenue generated by Certified Mail pieces sent to each of the following:
 - (1) a federal, state or local taxing authority;
 - (2) law firms:
 - (3) police departments;
 - (4) banks;
 - (5) mortgage institutions; and
 - (6) real estate companies.

Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.

(c) For FY 2000, of the 84 percent of all Certified Mail articles that had return receipts attached to them, how many of them did not receive the required recipient signature?

RESPONSE:

- a. The 84 percent was arrived at by taking the number of return receipts (228,370,704) divided by the total certified volume (271,290,408). These volumes are in the FY 2000 certified mail billing determinant in LR-J-98.
- b. The Postal Service does not collect this type of information.

OCA/USPS-T-36-6 (CONTINUED)

RESPONSE:

c. I do not know how many, if any, return receipts attached to certified mail did not receive the required recipient signature in FY 2000.

OCA/USPS-T36-7. The following refers to an advisory report issued May 2, 2001 by Nicholas F. Barranca, Vice President, Operations Planning and Processing regarding Certified Mail Observations at the Los Angeles Processing and Distribution Center (Report Number AC-MA-01-002).

- (a) Please identify each and every Processing and Distribution Center (P&DC) that has scanning equipment that is not compatible with the Signature Capture Program. Include in your response the volume of Certified Mail impacted by the lack of compatible scanning equipment during FY 2000 and FY 2001. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.
- (b) For each P&DC that employs the old scanning equipment identified in part "a" of this interrogatory, please explain whether or not the P&DC currently participates in the Signature Capture Program.
- (c) For each and every P&DC that does not currently participate in the Signature Capture Program, please explain why the facility is not participating. Also, if the reason for not participating in the Signature Capture Program is due to the lack of appropriate equipment or the lack of appropriate equipment links, please identify when the problem of incompatible equipment links with the national database will be resolved, and how the resolution will be accomplished. If no resolution is expected, please explain why none will be achieved. Include in your response the volume of Certified Mail impacted in FY 2000 and FY 2001.
- (d) Please identify each and every non-P&DC unit that currently handles Certified Mail and uses the "old scanning equipment" that is incompatible with the Signature Capture Program. Provide specific cites to all source documents used in preparing your response and include a copy of each reference used if one has not been previously filed in this docket.
- (e) Referring to part "d" or this interrogatory, for each and every non-P&DC that does not currently participate in the Signature Capture Program, please identify:
 - (1) when the problem of incompatible equipment links with the national database will be resolved, and
- (2) how the resolution will be accomplished. If no resolution is expected, please explain why no resolution will be achieved. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.

OCA/USPS-T36-7 (CONTINUED)

(f) For each year, FY 2000 and FY 2001, please provide the number of Certified Mail transactions and the revenue impacted by using "old scanning equipment" that was not linked to the national database. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.

RESPONSE:

The May 2 report was issued by the Office of the Inspector General, not Nicholas Barranca.

a. – f. I am not aware of any processing centers with scanners that are not compatible with the signature capture program. The equipment cited in the OIG report is not equipment used for signature capture. The equipment identified is older computerization used for preparing firm sheets prior to the implementation of signature capture. All P&DCs currently participate in the signature capture process and have compatible equipment for this operation.

OCA/USPS-T36-9. Docket No. R2000-1, USPS-LR-I-200 at 3 states, "Prior Postal Inspection Service investigations and audits have determined the customer is often confused between the definitions of registered, certified and insured mail." Since Docket No. R2000-1, what steps has the Postal Service taken to better inform customers of the differences between each of the three services? Provide specific cites to all source documents used in preparing your response and include a copy of each source referenced if one has not been previously filed in this docket.

RESPONSE:

The Postal Service has published Publication 370 "Extra Services" which provides a simplified explanation for each special service mentioned. (See attached copy.) Also, definitions of these special services are located in the shipping information section of the Postal Service's website, www.usps.com. Many post offices have new menu boards and in-store messaging that distinguishes between those services that "confirm" delivery and those services that "secure" delivery. Finally, the Postal Service has created a Hispanic website on www.usps.com which includes a segment with simple definitions for special services.

RESORIED IRST-CLASS MAIL OSTAGE & FEES PAII JSPS FERMIT NO. G-10

Extra Services

Registered Mail
Return Receipt
Certified Mail
Post office Box
Service
Rostal Insurance
Money Orders
and much more



More ways to fly the on Eagle."



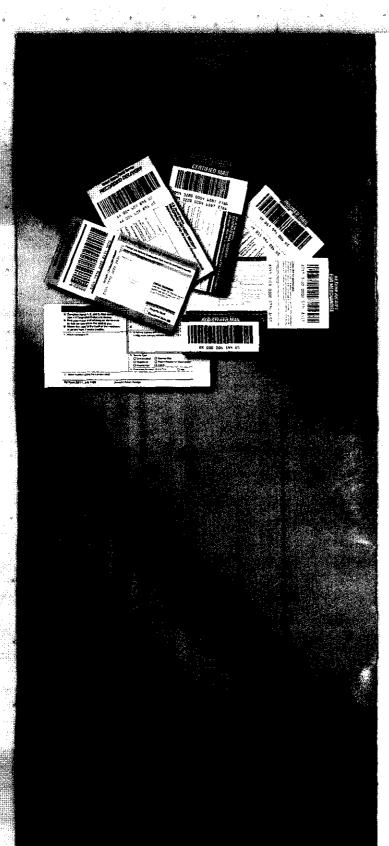




UNITED STATES
POSTAL SERVICE

WWW.usbs.com

Attachment to Response to OCA/USPS-T36-9 Page 2 of 8



For Convenience and Peace of Mind—Easily and Economically

You can add value to the way you send or get your mail with a variety of our extra services.

For example, you can arrange to pick up your mail—rather than have it delivered—if this is more convenient for you.

You can have stamps mailed to you rather than going to a post office to buy them. You can also obtain other mailing services from your home or office.

You can rest easier about your mailings with documentation of mailing and delivery, plus the security of low-cost insurance and registry.

You can save time by filling out the forms you need to use for these services before you go to the window. Most of the forms are available in the post office lobby.

Here are the basic extra services we offer, grouped under the benefits they provide.

Getting a Receipt

- Receipts of purchase are available at no extra charge
- Your retail clerk can provide them

Getting Proof You Sent It



Certificate of Mailing Form 3817

Do you need proof that your item was mailed? Use a Certificate of Mailing. Here's how:

- Use Form 3817 at the time of mailing
- Fee: 60¢ in addition to regular postage

Attachment to Response to OCA/USPS-T36-9 Page 3 of 8



Certified Mail Form 3800

Certification lets you know that your item was mailed—and that it was received. Here's what you need to do:

- Complete Form 3800
- Affix its numbered sticker to your mailpiece
- A receipt is provided proving an item was mailed and serves as a record of its delivery
- Delivery record is kept at the addressee's post office
- Fee: \$1.40 in addition to regular postage
- Available for First-Class Mail® and Priority Mail™



Recorded Delivery (International) Forms 8099, 2865

This service—available only to certain countries—provides a receipt of mailing for letters and small packages and a record of delivery, which is kept at the destination post office. Here's what you need to do:

- Complete Form 8099 and piace it on your mailpiece
- Request a return receipt by completing Form 2865
- Fee: check with your local post office for the cost of this service



Return Receipt for Merchandise Form 3804

This service will give you both a receipt showing an item was mailed and a return receipt. Simply:

Mark mail with "Return Recoils
Requested" above the deliver and its
and to the right of the return and assets

- Fill in the numbered label (Form 3804)
- Place label under the "Return Receipt Requested" endorsement

That's all you have to do.

- Delivery record is kept at the addressee's post office
- Service is for merchandise only
- Available with Priority Mail,™ single-piece Standard Mail, Parcel Post;™ Bound Printed Matter, Special Standard Mail and Library Mail
- Fee: \$1.40 in addition to postage and other fees at time of mailing, or \$7.00 if after the time of mailing

Getting Proof They Got It

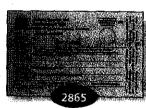


Return Receipt Form 3811

A return receipt lets you document when and to whom an item was delivered. It also lets you know the delivery address,

if it's different from the address on the mailpiece. All you have to do is:

- Complete Form 3811 at the time of mailing, or Form 3811-A if after the time of mailing
- Mark mail with "Return Receipt Requested"
- Place endorsement above the delivery address and to the right of the return address



- Fee is \$1.25 in addition to postage at the time of mailing, or \$7.00 if after the time of mailing
- For international mail, request a return receipt with Form 2865
- Available with Registered Mail, Certified Mail, Collect on Delivery, Express Mail™ or mail insured for more than \$50

Return Receipt for Merchandise

This service—as previously described—gives you:

- A mailing receipt
- A return receipt for merchandise

A delivery record is also kept at the addressee's post office.

Delivery Confirmation



This new service lets you find out the date your item was delivered, attempted, forwarded or returned by making a toll-free phone call or visiting our website.

It applies to Priority Mail," Parcel Post;" Bound Printed Matter, Library Mail and Special Standard Mail.

Delivery Confirmation:

- Uses a barcode to confirm delivery
- Gives the customer the date of delivery or attempted delivery (if appropriate)

The fees vary according to class of mail and whether it is purchased at a post office (retail) or the mailer is certified to submit an electronic manifest (electronic).

For Extra Peace of Mind



Postal Insurance Form 3813-P

Express Mail™ shipments:

- Automatically insured for \$500 for merchandise and document reconstruction
- Extra insurance, up to \$5,000, is available for:
- Merchandise, for an additional fee
- In every case you will receive a:
- Receipt (save until the article mailed is accounted for)

Delivery record for items insured for over \$50 will be kept at addressee's post office.

Bulk Mail Insurance

Bulk mail insurance is available for mail that is entered in designated facilities, in a manner prescribed by the Postal Service, and/or mail sent under the following classification schedules:

- First-Class Mail[®] Priority Mail[™] and Standard Mail Uparcel shippers who utilize an approved manifest mailing system
- Fee: contact your local post office
- See Publication 99 for more information

Provides indemnity for the lesser of the actual value of the article at the time of mailing or the wholesale cost of the contents to the sender. Under bulk mail insurance standards, all claims must be filed by the mailer.

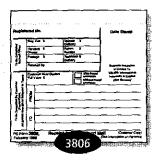


Registered Mail Form 3806

This is the most secure way to send First-Class Mail® and Priority Mail™ domestically and internationally.

Registered mail provides both a receipt showing an item was mailed and a record of delivery, which is kept at recipient's post office.

Here's how you can register mail:



- Present it to a rural carrier or bring it to any post office branch or station
- A red registered mail label is placed on the mailpiece
- Fee: based on the value of the mailing
- Insured for up to \$25,000

Insurance is included for all registered mail valued at more than \$100 and is optional for items valued at \$100 or less. The Postal Service will also handle registered mail over \$15 million in value.

Restricted Delivery

Restricted delivery ensures that mail is delivered only to a specific addressee or addressee's authorized agent. This service is available with:

- Registered Mail
- Certified Mail
- COD Mail
- Mail insured for more than \$50
- Fee: \$2.75 in addition to postage

A return receipt may also be requested as described previously. The mail should be marked "Restricted Delivery" above the address and to the right of the return address.

Attachment to Response to CCA/USPS-T36-9 Page 5 of 8



Claims for Loss or Damage Form 1000

You may file a claim for compensation for damage or loss of:

- Insured Mail
- Insured Registered Mail
- Insured International Mail
- Express Mail™
- COD Mail

For domestic claims:

- Complete Form 1000
- Present at post office along with:
 - Damaged mail packaging and container
 - Original mailing receipt
 - Proof of value

For lost insured mail, proof of loss must be established. The Postal Service will provide guidance for this procedure.

For international mail, ask for Publication 122-A, Customer Guide to Filing Inquiries and Claims on International Mail.

Special Attention for Mail

Special Handling

This service is for parcels with unusual contents—such as honeybees or live poultry—that need special attention in transit and delivery. It should not be used in place of insured or registered mail for valuable, fragile or irreplaceable items.

Special handling mail is:

- Wrapped in distinctive sacks and containers to set it apart from other mail
- Placed onboard trucks last and offloaded first
- Available for Standard Mail parcels only
- Available for both international and domestic destinations

Sending Money or Goods



Money Orders

Money orders can be purchased with either cash or traveler's checks at any post office in the U.S. and

its possessions. A lost or stolen money order may be replaced upon presentation of receipt.

- Maximum amount of a money order is \$700
- Multiples up to a daily total of \$10,000 may be bought—identification and information required for purchases over \$3,000

Domestic Money Orders

- Valid for an unlimited period
- Can be cashed at post office or bank in the U.S. and its possessions
- Fee: 80¢

International Money Orders

There are two types of international money orders:

- Direct International Postal Money Order Fee: \$3.00
- Standard International Postal Money Order Fee: \$8.50

Not all international money orders are accepted in all countries. Ask at your post office about which one to send.

Collect on Delivery (COD)

Merchandise (up to \$600) you have ordered from a retailer can be sent COD at your request. To do this, pay the letter carrier who makes the delivery:

- In cash
- With a check payable to the sender

Merchandise Return Service

This is a convenience extended to you by a growing number of retailers who deliver orders by mail. If you wish to return a purchase:

- Affix the special label that accompanies the order
- Drop the parcel in the mail
- Fee: postage is paid by the retailer

Attachment to Response to OCA/USPS-T36-1 Page 6 OF 8

Ease and Convenience



EASY STAMP

You now have three EASY STAMP ways to get stamps without having to go to the post office.

Stamps by Mail® delivers your stamps within about 5 business days. To use this service, simply:

- Obtain Form 3227
- Mark the items and quantities you want
- Enclose a check or postal money order for the exact amount of your purchase
- Mail your order
- Fee: no additional charge

Stamps by Phone delivers your stamps within 5 business days. For this service, simply:

- Call toll-free 1-800-STAMP-24 (1-800-782-6724)
 24 hours a day, 7 days a week
- Place your order
- Pay with Visa, MasterCard, Discover or American Express
- Fee: there is a small service charge

Stamps on Consignment may be found at certain supermarkets, banks and other retailers. These outlets normally offer you:

- First-Class Mail®postage stamps
- Express Mail™ postage stamps
- Priority Mail™ postage stamps
- Fee: no additional charge

Self-Service Postal Centers

To expand service, we have installed self-service postal centers in convenient locations such as malls, popular shopping streets and post office lobbies.

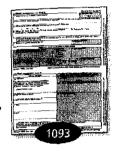
Hours of service: many are open 24 hours a day,
 7 days a week

Services available from automated vending equipment include:

- Individual stamps
- Stamp booklets
- Envelopes
- Stamped cards
- Regular letter service

Your local post office can give you the locations of self-service postal centers in your community.

Picking Up Your Own Mail



Post Office Box Service Form 1093

This service makes it easy for you to pick up mail whenever your post office lobby is open.

At some facilities, access is available 24 hours a day. You have a choice of box sizes. To obtain this service, simply:

■ Complete Form 1093

- Submit the form at any post office window
- Fee: dependent on the type of facility and size of box

Caller Service Form 1093

Use this service if you regularly receive more mail than the largest box in your post office will hold. You can pick up mail at a post office call window or loading dock when the office is open. Here's how:

- Complete Form 1093
- Submit it at any post office window

Stamp Collecting

The United States Postal Service maintains a special organization to provide services and products to stamp collectors from all over the world.

To find out more about stamp collecting, pick up

The Postal Service Guide to U.S. Stamps. It gives
basic information for beginners and illustrates hundreds
of old and new stamps available for purchase.

The guide is:

Hedated annually

Available at most post offices

■ Fee: \$12.95

Free catalogs or current stamp issues are also available from your post office at various times throughout the year.

Attachment to Response to OCA/USPS-T36-9 Page 7 of 8

Special Services Fees

Special Handling	
Weight	Fee*
Not more than 10 pounds	\$5.40
More than 10 pounds	7.50
Registered Mail	
Declared Value	Fee*
\$0.00 to \$100 (without insurance)	\$6.00
\$0.00 to \$100 (with insurance)	6.20
100.01 to 500	6.75
500.01 to 1,000	7.30
1,000.01 to 2,000	7.85
2,000.01 to 3,000	8.40
3,000.01 to 4,000	8 95
4,000.01 to 5,000	9.50
5,000.01 to 6,000	10.05
6,000.01 to 7,000	10.60
7,000.01 to 8,000	11.15
8,000.01 to 9,000	11.70
9,000.01 to 10,000	12.25
10,000.01 to 11,000	12.80
11,000.01 to 12,000	13.35
12,000.01 to 13,000	13.90
13,000.01 to 14,000	14.45
14,000.01 to 15,000	15.00
15,000.01 to 16,000	15.55
16,000.01 to 17,000	16.10
17,000.01 to 18,000	10.10
18,000.01 to 19,000	16.65
19,000.01 to 20,000	17.20
20,000.01 to 20,000	17.75
20,000.01 to 21,000	18.30
21,000.01 to 22,000	18,85
22,000.01 to 23,000	19.40
23,000.01 to 24,000	19.95
24,000.01 to 25,000	
Additional fees for article valued over \$25,000 are for handli	ng only
\$25,000.01 to \$1,000,000 \$20.50 p	olus handling
charge of \$0.55 per \$1,000 or fraction over the first	\$25,000
\$1,000,000.01 to \$15,000,000 \$556.75 p	olus handling
charge of \$0.55 per \$1,000 or fraction over the first	
Over \$15,000,000	
charges determined by Postal Service based on weigh	
and value	וו, אףמנפ
ung value	

Special Services Fees

Post Office Box	For service provided as described in £910
Box fee per semiann	ual (6-month) period:

Fee	Box Size and Fee						
Group		2	3	4	5		
Α	\$30.00	\$46.00	\$80.00	\$151.00	\$261.00		
В	27.00	41.00	70.00	136.00	217.00		
C	22.00	32.00	57.00	97.00	162.00		
D	7,00	12.00	22.00	33.00	52.00		
E	0.00	0.00	0.00	0.00	0.00		

Caller Service

For service provided, per semiannual (6-month) period:

\$275.00 275.00 275.00
275.00
2 . 0 . 0 0
275.00

Certified Mail Fee* \$1.40

Return Receipt for Merchandise

	mi necept to merenalise	
Туре	Fee*	,
	Requested at the time of mailing showing to whom	
	(signature), date and addressee's address (if different) \$1.40	ı
	Delivery record	,
	<u></u>	

Return Receipt

е		Fee*
	Requested at the time of mailing showing to whom (signature), date and addressee's address (if different)	\$1.25
	Requested after mailing showing only to whom and date delivered	7.00

to whom and date delivered	7.00
Delivery Confirmation	<u></u>
Service	Fee*
Used in conjunction with Priority Mail™	
Retail (purchased at retail window)	\$0.35
Electronic (certified electronic manifest mailers)	0.00
Used in conjunction with Parcel Post,™ Bound Printed Matter, Library	
and Special Standard Mail	
Retail (purchased at retail window)	0.60
Electronic (certified electronic manifest mailers)	

^{*}Fee is in addition to postage and other fees

^{*}Fee is in addition to postage and other fees

Attachment to Response to OCA/USPS-T36-9 Page 8 of 8

Special Services Fees

Express Mail**Insurance For the amount of merchandise insurance liability
Insurance Coverage Desired Fee*
\$0.01 to \$500 None
500.01 to \$,000 \$0.95
For each \$100 or fraction thereof over the \$500 value
Maximum liability for merchandise: \$5.000
Maximum liability for document reconstruction: \$500

Insured Mail	
Insurance Coverage Desired	Fee*
\$0.01 to \$50	\$0.85
50.01 to 100	1.80
100.01 to 200	2.75
200.01 to 300	3.70
300.01 to 400	4.65
400.01 to 500	5.60
500.01 to 600	6.55
600.01 to 700	7.50
700.01 to 800	8.45
800.01 to 900	9,40
900.01 to 1,000	10.35
1,000.01 to 5,000	10.35 plus 0.95
For each \$100 or fraction thereof over \$1,000 in declared w	alue
Maximum liability for insured mail: \$5,000	
Bulk insurance discount: \$0.40 per piece	

Collect on Delivery (COD)	
Amount to be collected or insurance coverage desired	Fee*
\$0.01 to \$50	\$4.00
50.01 to 100	5.00
100.01 to 200	6.00
200.01 to 300	7.00
300.01 to 400	8.00
400.01 to 500	
500.01 to 600	10.00
Notice of nondelivery	
Alteration of COD charges or	
designation of new addressee	3.00
Fee for registered COD is \$4.00 regardless of insurance value	

	\$2.73
Money Orders	
Service	Fee
Postal military money order (issued by military facilities authorized by the Department of Defense)	\$0.30
Domestic money order (issued at other post offices, including those with branches or stations on military installations)	0.80
inquiry fee (includes the issuance of a copy of a paid money order	ar) 2.75
Direct international money order (check with post office for foreign country acceptance)	3.00
Standard international money order (check with post office for foreign country acceptance)	

\$2.75

Restricted Delivery



Need More Information?

For additional information on postal products for services, ask your local post office or visit our website at www.usps.com.

^{*}Fee is in addition to postage and other fees

OCA/USPS-T36-10. The Area Coordination Audit Special Services, May 18, 1999, Case No. 040-1241887-PA(2) at 3, indicates that post offices "were not providing the required level of security required by Postal regulations for registered mail."

- (a) Case No. 040-1241887-PA(2) refers to handbook DM-901. If the DM-901 referenced in the case differs from the Domestic Mail Manual, DMM, please provide a copy of handbook DM-901.
- (b) Has the Northeast "Area" taken corrective action to provide the required level of security for registered mail? If so, please identify the corrective action taken. If not, please explain why none was taken.
- (c) Are all Postal Service "areas" currently providing the level of security for registered mail as required by "DM-901"? If not, please identify:
 - (1) the number of areas out of compliance;
 - (2) the number of transactions and the amount of revenue impacted and
 - (3) the anticipated date corrective action will be taken to bring each "area" into compliance with DM-901. Provide specific cites to all source documents used in preparing your response and include a copy of each source referenced if one has not been previously filed in this docket.
- (d) Currently, are all Highway Contract Route drivers signing for registered mail as required by DM 901.43? If not, please explain why all such drivers are not signing for the registered mail placed in their possession.

RESPONSE:

a. It is different. A copy is provided in Library Reference J-140.

OCA/USPS-T36-10. (CONTINUED)

RESPONSE:

- b. Yes, corrective action has been taken. A review of registered mail processing practices was conducted and the proper procedures were clarified. It is my understanding these proper procedures are now being followed.
- c. I do not know if any areas are out of compliance. However, a new training module is currently in development. Once completed, all personnel handling registered mail will receive the new training materials.
- d. To the best of my knowledge, all Highway Contract Route drivers are signing for registered mail.

OCA/USPS-T36-11. In FY 2000 and FY 2001, what volume of Certified Mail is processed on Delivery Point Sequence (DPS) automation equipment? Provide specific cites to all source documents used in preparing your response and include a copy of each source used if one has not been previously filed in this docket.

RESPONSE:

The Postal Service does not collect this type of information.

OCA/USPS-T36-14.	For FY 2000 and FY 2001, what proportion of Certified Ma	ail
transactions is delive	red to a firm hold out?	

RESPONSE:

The Postal Service does not collect this type of information.

OCA/USPS-T36-15. Please provide an explanation of how a Delivery Confirmation mail piece is processed once it is accepted by a local USPS window clerk and is destined for a non-local destination. Please include in your response an explanation of:

- (a) how the piece is processed on incoming and outgoing equipment;
- (b) where and when the mail piece is scanned, and
- (c) how the information on the final scan is uploaded for "public" viewing. Provide specific cites to all source documents used in preparing your response and include a copy of each source document if one has not been previously filed in this docket.

RESPONSE:

- a. Redirected to witness Kingsley.
- b. Single piece non-local Delivery Confirmation mail is accepted by a retail employee. If accepted at an office with POS One or an IRT, the piece may receive an acceptance scan as part of the sales transaction. At the time of delivery or attempted delivery the mailpiece is scanned again.
- c. The scan information is transmitted from the scanning device to a database where it is available for viewing via the Internet Track & Confirm page.

OCA/USPS-T36-17. The following refers to the USPS Delivery Confirmation product offering.

- (a) What is the successful read rate for the Postal Service's initial scan?
- (b) For the initial scan, what is the average time delay between the initial scan and the ability of the customer to view the data collected via the Internet?
- (c) What is the successful read rate of the Postal Service's final scan?
- (d) For the final scan, what is the average time delay between the final scan and the ability of the customer to view the data collected via the Internet?
- (e) Does the Postal Service maintain a database of Delivery Confirmation comments and/or complaints? If so, please identify the name of the database.
- (f) What are the ten most frequently reported complaints made by customers regarding the Delivery Confirmation product offering?
- (g) What are the ten most frequently reported favorable comments made by customers regarding the Delivery Confirmation product offering?
- (h) Why hasn't the Postal Service extended the Delivery Confirmation offering to First-Class letters?

RESPONSE:

- a. Barcode read rates are 99 percent for items scanned at acceptance.
- b. Data are available at different times depending on the device and the location. Downloads of data take place at close of business, at regularly scheduled times during the day, or when the handheld scanner is cradled.

OCA/USPS-T36-18. Does the Postal Service have a method of tracking the number and types of complaints made regarding Postal Service insurance?

- (a) If so, please identify the system used to track Postal Service insurance claim complaints.
- (b) If not, please explain why the Postal Service does not track insurance complaints.
- (c) For FY 2000 and FY 2001, please identify the ten most frequently reported customer complaints regarding Postal Service insurance.
- (d) For FY 2000 and FY 2001, please identify the ten most frequently reported favorable customer comments regarding Postal Service insurance.
- (e) Has the Postal Service performed any analysis or prepared any reports that addresses the types and number of complaints the Postal Service receives about insurance claims? If so, please provide a copy of all analyses or reports prepared. If none has been conducted, please explain why not.

RESPONSE:

The Postal Service tracks complaints regarding non-claim insurance issues under the specific issue and not under a general insurance category. For example, if there is a complaint about the price of insurance, the complaint would be registered under a pricing complaint category, and not under a general insurance category.

OCA/USPS-T36-18. (CONTINUED)

RESPONSE:

- a. The only complaints regarding insurance claims that are tracked are those complaints received in the district Consumer Affairs offices. The system used to track this "subset" of insurance claims complaints is the Consumer Affairs Tracking System (CATS).
- b. Not applicable.
- c. Following are the top listed complaints concerning insurance claims from the CATS in 2000 and 2001 identified by the frequency of the complaint, with "1" signifying the highest number of complaints and "6" signifying the lowest number of complaints.

2000

- 1. Disagree with decision
- 2. Disagree with amount paid
- 3. Processing time too long
- 4. No record
- 5. Process is difficult
- 6. Check not received

OCA/USPS-T36-18. (CONTINUED)

RESPONSE:

c. (continued)

<u>2001</u>

- 1. Processing time too long
- 2. No record
- 3. Process is difficult
- 4. Disagree with decision
- 5. Check not received
- 6. Disagree with amount paid
- d. The compliments received are only logged in as compliments and are not categorized.
- e. The Postal Service produces a "Trend by Details" national report that lists the type and number of insurance claims complaints received. See the attached pages for the 2000 and 2001 reports.



Trend by Details - National 2000

Problem

Retail

Claim

Issue	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	ΔŢΩ
Claim	0	2	1	2	1	1	2	2	0	1	244	667	594	1517
Involved	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTĐ
Claims Appeal	0	0	0	0	0	1	0	0	0	0	1	11	13	26
Details	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
Check Not Received	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Disagree With Amount Paid	0	0	0	0	0	0	0	0	0	0	0	1	2	3
Disagree With Decision	0	0	0	0	0	0	0	0	0	0	0	1	1	2
FCATS v 2.3	0	0	0	0	0	1	0	0	0	0	1	9	9	20
No Record	0_	0	0	0	0	0	0	0	0	0	0	0	0	0
Process Is Difficult	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Processing Time Too Long	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Involved	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
Domestic	0	0	0	0	0	0	0	0	0	1	38	170	56	265
Details	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
Check Not Received	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Disagree With Amount Paid	0	0	0	0	0	0	0	0	0	0	3	35	9	47
Disagree With Decision	0	0	0	0	0	0	0	0	0	0	26	104	37	167
FCATS v 2.3	0	0	0	0	0	0	0	0	0	1	5	4	4	14
No Record	0	0	0	0	0	0	0	0	0	0	1	7	3	11
Process Information	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Process Is Difficult	0	0	0	0	0	0	0	0	0	0	0	6	0	6
Processing Time Too Long	0	0	0	0	0	0	0	0	0	0	2	14	3	19
	AP	AP	AP	AP	1									

Trend by Details

Attachment to Response to OCA/USB-T36-181
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Page 2 of 2

Involved	1 _	2	3	4	5	6	7	8	9_	10	11	12	13	YTD
FCATS v 2.3	0	2	1	2	1	0	2	2	0	0	198	469	514	1191
Details	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
FCATS v 2.3	0	2	1	2	1	0	2	2	0	0	198	469	514	1191
Involved	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
International	0	0	0	0	0	0	0	0	<u> </u>	0	7	17	11	35
Details	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
Check Not Received	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Disagree With Amount Paid	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Disagree With Decision	0_	0	0	0	0	0	0	0	0	0	0	2	1	3
FCATS v 2.3	0_	0	0	0	0	0	0	0	0	0	5	11	7	23
No Record	0	0	0	0	G	0	0	0	0	0	1	1	0	2
Process Is Difficult	0	0	0	0	0	0	0	0	0	0	0	1	0	1
Processing Time Too Long	0	0	0	٥	0	0	0	0	0	0	1	2	3	6



Trend by Details - National 2001

Problem

Retail

Claim

Issue	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	ΔŢD
Claim	393	264	265	130	184	157	196	297	189	119	121	156	144	2615
Involved	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
Claims Appeal	9	5	8	1	10	13	11	7	8	6	26	43	16	163
Details	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
Check Not Received	1	2	1	0	1	1	2	0	2	0	0	0	0	10
Disagree With Amount Paid	0	0	1	0	1	0	1	1	1	1	2	5	3	16
Disagree With Decision	4	1	1	0	4	9	7	4	3	1	18	34	9	95
FCATS v 2.3	1	0	0	0	0	0	0	0	1	0	0	0	0	2
No Record	1	2	2	0	0	0	0	0	0	0	3	3	1	12
Process Is Difficult	0	0	0	0	3	0	0	0	0	1	0	0	0	4
Processing Time Too Long	2	0	3	1	1	3	1	2	1	3	3	1	3	24
Involved	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
Domestic	148	238	243	121	158	130	165	261	160	98	75	96	97	1990
Details	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
Check Not Received	12	8	10	16	9	10	12	18	7	9	7	7	10	135
Disagree With Amount Paid	14	14	2	7	6	9	15	14	8	16	8	3	2	118
Disagree With Decision	54	51	33	27	56	43	78	40	40	22	27	21	15	507
FCATS v 2.3	2	0	0	0	0	0	0	0	0	0	0	0	0	2
No Record	8	26	25	16	16	11	16	15	12	10	12	19	14	200
NO RECOID	JL						0	0	0	0	1	0	l 0	1
Process Information	0	0	0	0	0	0		<u> </u>			-			
	\ <u></u>	0 21	6	0 16	0 15	19	21	15	21	7	8	25	8	186
Process Information	0		(<u> </u>		<u> </u>		<u> </u>	21 72	7 34	8 12	25 21	 	186 841

Trend by Details

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Involved	1	2	_3_	4	5	6	7	8	9	10	11	12	13	YTD
FCATS v 2.3	216	6	2	1	1	0	1	3	4	2	4	1	3	244
Details	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
FCATS v 2.3	216	6	2		1	0	1	3	4	2	4	1	3	244
Involved	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
International	20	15	12	7	15	14	19	26	17	13	16	16	28	218
Details	AP 1	AP 2	AP 3	AP 4	AP 5	AP 6	AP 7	AP 8	AP 9	AP 10	AP 11	AP 12	AP 13	YTD
Check Not Received	2	0	0	0	0	3	1	4	2	0	1	0	2	15
Disagree With Amount Paid	2	0	1	0	0	0	0	1	0	0	1	0	0	5
Disagree With Decision	1	2	1	1	0	1	0	1		2	3	4	4	21
FCATS v 2.3	4	0	0	0	0	0		1	0	0	0	0	0	5
No Record	2	6	3	3	2	0	1	2	1		6	2	5	34
Process Is Difficult	1	3	1	0	4	2	5	8	2	2	0	2	1	31
Processing Time Too Long	8	4	6	3	9	8	12	9	11	8	5	8	16	107

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: OctoBER 15,2001

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, S.W. Washington, D.C. 20260–1137 October 15, 2001