

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, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MAYO TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T36-19-36)

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-T36-19 to 36, filed on October 10, 2001.

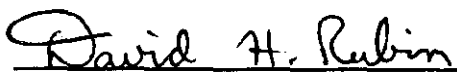
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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October 24, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T36-19-36)**

OCA/USPS-T36-19. On the Postal Service's website, at "<http://www.usps.com/shipping/delfaq>," the Postal Service makes the following representation in answering the question "When will delivery status information be available?": delivery status information will be available on "[t]he evening of the date of delivery or attempted delivery."

- a. For what percentage of Delivery Confirmation volume is delivery status information available on the evening of the date of delivery or attempted delivery? Please cite the source for this answer. If the source material is not already on file with the Commission, then please provide a copy of the source material.
- b. Please identify the Postal Service database[s] that maintain data on Delivery Confirmation deliveries.
- c. Describe the full array of information reported in the Delivery Confirmation database[s]. List each type of datum that is collected.
- d. Describe the reports that are routinely generated from the Delivery Confirmation database[s].

RESPONSE:

- a. The Postal Service does not collect this type of information.
- b. The Product Tracking System database maintains data on Delivery Confirmation deliveries.
- c. Date, time, and location of scan event is the information reported in the database. The scan events for individual pieces can include acceptance, delivery, attempt, enroute, forward, and/or return.

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OCA/USPS-T36-19. (CONTINUED)

RESPONSE:

d. The routinely generated reports from the database are scan performance reports and Priority Mail (with retail Delivery Confirmation acceptance scan) service performance reports.

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OCA/USPS-T36-20. On the Postal Service's website, at "<http://www.usps.com/shipping/delfaq>," the Postal Service makes the following representation in answering the question "What if I know my package arrived and there is still no delivery information available?": "If there are no delivery scans in our system and you know your package has been delivered, you can request a refund for the Delivery Confirmation fee . A refund of the service fee can be requested if delivery information is not available 30 days from the date of mailing." It is also stated that "evidence of postage and mailing" will be required for a refund.

- a. How can a mailer provide "evidence of postage" in instances in which the mailer has not visited a retail window but has applied stamps to pay for the postage on the package and the Delivery Confirmation fee and then deposited the item (assuming it weighs less than one pound) in a collection box? Please explain fully.
- b. If mailers are unable to furnish proof of postage because stamps have been used to pay the Delivery Confirmation fee, then will the refund be refused? Please explain fully.
- c. List all forms of evidence of postage and mailing that the Postal Service will accept that may entitle a customer to a refund.

RESPONSE:

- a. A mailer would need a postal "round dated" Delivery Confirmation receipt, PS Form 152, to provide evidence that the item was mailed and that the Delivery Confirmation fee was paid. That receipt would not be available in the *circumstances you describe.*

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OCA/USPS-T36-20. (CONTINUED)

RESPONSE:

b. The refund of the 40-cent Delivery Confirmation fee generally will not be paid absent evidence that the Delivery Confirmation fee was paid and the item was mailed.

c. Evidence of postage and mailing would be a round dated receipt, PS Form 152 or Firm Mailing Book.

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OCA/USPS-T36-21. What are the chief reasons for failures to have the delivery information on Delivery Confirmation pieces available to customers by the 30th day? What steps has the Postal Service taken to rectify such failures?

RESPONSE:

The chief reason would be that the scan was not performed. Communication of proper scanning procedures is conveyed to the field from the program office at Postal Service Headquarters on a regular basis. Each District Office is responsible for monitoring scan performance data and reacting accordingly with individual offices.

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OCA/USPS-T36-22. Please fill in the following table for the number of days from date of *mailing* that delivery information was made available to customers in FY 2000. Please cite the source for information provided in the table. If the source material is not already on file with the Commission, then please provide a copy of the source material.

| <u>Number of Days Following Mailing</u> | <u>Percentage of Total Reported Deliveries Under Delivery Confirmation</u> |
|---|--|
| 1 day following mailing | % of total |
| 2 days following mailing | % of total |
| | |
| [fill in for <i>each</i> of 3 days - 30 days following mailing] | % of total |
| more than 30 days following mailing | <u>% of total</u> |
| | should sum to 100 % |

RESPONSE:

The Postal Service does not collect this type of information.

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OCA/USPS-T36-23. Please fill in the following table for the number of days from date of *mailing* that delivery information was made available to customers in FY 1999. Please cite the source for information provided in the table. If the source material is not already on file with the Commission, then please provide a copy of the source material.

| <u>Number of Days Following Mailing</u> | <u>Percentage of Total Reported Deliveries Under Delivery Confirmation</u> |
|---|--|
| 1 day following mailing | % of total |
| 2 days following mailing | % of total |
| | |
| [fill in for <i>each</i> of 3 days - 30 days following mailing] | % of total |
| more than 30 days following mailing | <u>% of total</u> |
| | should sum to 100 % |

RESPONSE:

The Postal Service does not collect this type of information.

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OCA/USPS-T36-24. Please fill in the following table for the number of days from date of *delivery* that delivery information was made available to customers in FY 2000. Please cite the source for information provided in the table. If the source material is not already on file with the Commission, then please provide a copy of the source material.

| <u>Number of Days Following Delivery</u> | <u>Percentage of Total Reported Deliveries Under Delivery Confirmation</u> |
|--|--|
| 1 day following delivery | % of total |
| 2 days following delivery | % of total |
| | |
| [fill in for <i>each</i> of 3 days - 30 days following delivery] | % of total |
| more than 30 days following delivery | <u>% of total</u> |
| | should sum to 100 % |

RESPONSE:

The Postal Service does not collect this type of information.

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OCA/USPS-T36-25. Please fill in the following table for the number of days from date of *delivery* that delivery information was made available to customers in FY 1999. Please *cite the source for information provided in the table*. If the source material is not already on file with the Commission, then please provide a copy of the source material.

| <u>Number of Days Following Delivery Under Delivery Confirmation</u> | <u>Percentage of Total Reported Deliveries</u> |
|--|--|
| 1 day following delivery | % of total |
| 2 days following delivery | % of total |
| | |
| [fill in for <i>each</i> of 3 days - 30 days following delivery] | % of total |
| more than 30 days following delivery | <u>% of total</u> |
| | should sum to 100 % |

RESPONSE:

The Postal Service does not collect this type of information.

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OCA/USPS-T36-26. After the 30th day following a mailing that includes the purchase of the Delivery Confirmation service, does the Postal Service continue to record the number of days that have elapsed until the delivery information finally is made available? Please explain fully.

RESPONSE:

No. It is rare for a scan to be done more than 30 days following a mailing, and recording the exact day in the few cases would not be cost effective.

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OCA/USPS-T36-27. What was the total number of Delivery Confirmation transactions made (either on a fee-paid or no-charge basis) in FY2000 for which a delivery scan was never reported? Please cite the source for the information provided. If the source is not on already on file with the Commission, then please provide a copy of the source material.

RESPONSE:

For FY 2000, delivery related scans were obtained on 95.78 percent of Delivery Confirmation barcoded pieces with an acceptance record. This Product Tracking System information excludes many pieces, such as those pieces entered in a collection box. Also, some of the missed scans resulted from problems introduced by customers, such as the placement of the Delivery Confirmation barcode on the back of a package, or the lack of any barcode. One hundred percent less this number would give you the percentage of non-reported scans. If one assumes that this non-scan percentage applies to all Delivery Confirmation transactions, then multiplying that percentage by the number of Delivery Confirmation transactions in FY 2000 (see USPS-LR-J-109, WP-4) would provide an estimate of the number of items for which an acceptance record or electronic file was obtained but no delivery related scan was reported.

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OCA/USPS-T36-28. What was the total number of Delivery Confirmation transactions made (either on a fee-paid or no-charge basis) in FY 1999 for which a delivery scan was never reported? Please cite the source for the information provided. If the source is not on already on file with the Commission, then please provide a copy of the source material.

RESPONSE:

For FY 1999, delivery related scans were obtained on 94 percent of Delivery Confirmation barcoded pieces with an acceptance record. This Product Tracking System information excludes many pieces, such as those pieces entered in a collection box. Also, some of the missed scans resulted from problems introduced by customers, such as the placement of the Delivery Confirmation barcode on the back of a package, or the lack of any barcode. One hundred percent less this number would give you the percentage of non-reported scans. If one assumes that this non-scan percentage applies to all Delivery Confirmation transactions, then multiplying that percentage by the number of Delivery Confirmation transactions in FY 1999 (see USPS-LR-J-92, page 25) would provide an estimate of the number of items for which an acceptance record or electronic file was obtained but no delivery related scan was reported.

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OCA/USPS-T36-29. What was the total number of requests for refunds of Delivery Confirmation fees made by Priority Mail mailers in FY 2000? Please cite the source for this answer. If the source material is not already on file with the Commission, then please provide a copy of the source material.

RESPONSE:

The Postal Service does not collect this type of information.

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OCA/USPS-T36-30. For the total number of requests for refunds of Delivery Confirmation fees made by Priority Mail mailers in FY 2000,

- a. What percentage of requests for refunds was paid?
 - b. What percentage of requests for refunds was denied?
 - c. What percentage of requests for refunds is pending?
- (Percentages given in answers a. - c. should sum to 100 percent).
- d. What were the chief reasons for denying refunds?

Please cite the source for these answers. If the source material is not already on file with the Commission, then please provide a copy of the source material.

RESPONSE:

- a. The Postal Service does not collect this type of information.
- b. The Postal Service does not collect this type of information.
- c. The Postal Service does not collect this type of information.
- d. The Postal Service does not collect this type of information.

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OCA/USPS-T36-31. What was the total number of requests for refunds of Delivery Confirmation fees made by Priority Mail mailers in FY 1999? Please cite the source for this answer. If the source material is not already on file with the Commission, then please provide a copy of the source material.

RESPONSE:

The Postal Service does not collect this type of information.

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OCA/USPS-T36-32. For the total number of requests for refunds of Delivery Confirmation fees made by Priority Mail mailers in FY 1999,

- a. What percentage of requests for refunds was paid?
- b. What percentage of requests for refunds was denied?
- c. What percentage of requests for refunds is pending?
(Percentages given in answers a. - c. should sum to 100 percent).
- d. What were the *chief reasons for denying refunds*?

Please cite the source for these answers. If the source material is not already on file with the Commission, then please provide a copy of the source material.

RESPONSE:

- a. The Postal Service does not collect this type of information.
- b. The Postal Service does not collect this type of information.
- c. The Postal Service does not collect this type of information.
- d. The Postal Service does not collect this type of information.

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OCA/USPS-T36-33. On the Postal Service's website, at "<http://www.usps.com/shipping/delfaq>," the Postal Service makes the following representation in answer to the question "Can I deposit a Delivery Confirmation mail piece in a collection box?": "you will not obtain a date stamped receipt (proof of mailing)." Will this lack of a receipt preclude a refund at a later time even in instances in which the delivery information was not made available 30 days from the date of mailing? Please explain fully.

RESPONSE:

Please see my response to OCA/USPS-T36-20 above.

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(OCA/USPS-T36-19-36)**

OCA/USPS-T36-34. On the Postal Service's website, at "<http://www.usps.com/shipping/delfaq>," the Postal Service makes the following representation in answering the question "Can rural letter carriers accept Delivery Confirmation pieces from customers on their route if the Form 152 is affixed?": rural route customers who give the carrier money to cover the postage and fees may get a date stamped receipt for the postage paid.

- a. If a rural customer has already applied stamps for the postage and Delivery Confirmation fee before handing the mailpiece to the carrier, can a date stamped receipt still be obtained from the carrier? Please explain fully.
- b. If no date stamped receipt is given in the circumstances described in part a. (and assuming that delivery information is not made available 30 days from the date of mailing), is a refund precluded? Please explain fully.

RESPONSE:

- a. Yes, a rural carrier can return a postmarked receipt if requested by the mailer.
- b. Please see my response to OCA/USPS-T36-20 above.

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(OCA/USPS-T36-19-36)**

OCA/USPS-T36-35. On the Postal Service's website, at "<http://www.usps.com/shipping/delfaq>," the Postal Service makes the following representation in answer to the question "Can city letter carriers accept Delivery Confirmation pieces from customers on their route if the Form 152 is affixed?": city route customers cannot obtain a date stamped receipt from a carrier. Will this preclude a refund at a later time (assuming that delivery information is not made available 30 days from the date of mailing)? Please explain fully.

RESPONSE:

Please see my response to OCA/USPS-T36-20 above.

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OCA/USPS-T36-36. Has the Postal Service ever considered adopting the practice employed in many commercial retail establishments of accepting a customer's good faith oral representation that a service paid for has not been provided and paying the refund claim based upon such an oral statement? If not, why not?

a. Do you agree that accepting such oral representations on good faith promotes good will on the part of customers? If not, why not?

b. Do you agree that inflexible requirements concerning proof of postage and mailing may engender customer discontent and alienate customers? If not, why not?

c. If the practice described in the premise of the question has ever been considered, what was the outcome of such consideration?

RESPONSE:

After checking with others about Headquarters consideration of adopting such a practice, I have no knowledge of such consideration.

- a. While relaxed rules on refund procedures might generate goodwill among customers receiving refunds, I do not know enough about the practice you describe to make an informed opinion.

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OCA/USPS-T36-36. (CONTINUED)

RESPONSE:

b. No. I believe that proof of purchase is a common practice when requesting a refund, barring extenuating circumstances. I personally would not expect a refund unless I provided proof of purchase and/or mailing (if applicable).

c. Not applicable, to the best of my knowledge.

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 24, 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 24, 2001