

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate and Fee Changes, 2001]

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-1 through 82]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. To reduce the volume of paper, I have combined related requests into a single numbered interrogatory, however, I am requesting that a specific response be made to each separate question asked. To the extent that a reference is made in the responses to a Library Reference, I would appreciate receiving a copy of the reference since I am located at a distance from Washington, DC. Any reference to testimony should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-1-18 in Docket C2001-1, dated May 19, 2001, are incorporated herein by reference. In accordance with the provisions of Rule 25[b], I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

November 26, 2001 Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-1 To enable me to better understand the changes in Fee Groups for Post Office Boxes, please advise both the present and the proposed Fee Groups for each of the facilities with Post Office Boxes in the 076 ZIP Code area [07601 through 07677].

DBP/USPS-2 [a] In those post offices that have City Delivery service, is it required to deliver mail six days a week [Monday through Saturday except legal holidays] at the following types of addresses: [1] City Delivery Route [2] Post Office Box [3] General Delivery [4] Rural Route [5] Highway Contract Route? Provide a regulatory reference which permits any negative responses. [b] Provide a similar response for post offices that do not have City Delivery service [Except, no response is needed for City Delivery routes]. Provide a regulatory

reference which permits any negative responses. [c] If exceptions may be made to the level of service, advise the level of management required for approval.

DBP/USPS-3 [a] Confirm that Insured Mail does not receive any special security from the time that the mail is accepted until it arrives at the delivery office, namely, it is transported in a similar manner to the same type of mail without insurance. [b] Confirm that mail insured for \$50 or less does not receive any special security at the delivery office. [c] Confirm that it will not be possible to determine, with absolute certainty, the amount of insurance that has been purchased [any value from \$50.01 to \$5000] by examination of the article. [d] Explain and discuss any subparts you are not able to confirm.

DBP/USPS-4 In order to determine the value to the customer for the ease and use of the collection system for First-Class Mail and other categories that may be mailed in collection boxes, please confirm, or explain and discuss if you are not able to fully confirm and/or provide any change which will make the indicated statement correct, each of the following as it applies to post offices that have city delivery service:

- a) Consistent with existing transportation, all collections should be made as late as possible.
- b) The specific requirements of the Postal Operations Manual must be complied with rather than a claim that collection times which do not meet these specific requirements are "consistent with the requirements of the local community" or reliance on another generalized claim.
- c) A collection box with a weekday 5 PM or later collection is required to be located at all post offices, branches, and stations.
- d) A collection box with a weekday 6:30 PM or later collection is required to be located all postal facilities that are in operation at that time.
- e) The Saturday collection is required at all 5 PM to 6:29 PM boxes at 1 PM or later and at all 6:30 PM or later boxes at 3 PM or later.
- f) All collections should be made as late as possible to meet the transportation. This applies to all collections on all days of the week. For example, if the transportation leaves a post office at 6:15 PM, the last collection in front of the post office should not be 5 PM but should be made some 15 to 20 minutes before the departure. This contemplates that the office is staffed and would not apply where the mail was picked up by a contractor from an "empty" post office.

- g) Residential collection boxes should be collected as late in the day as possible. While dedicated collection runs may be utilized, to have a letter carrier pass the box at a later time than shown on the collection box and not make the collection is not appropriate.
- h) Letter carriers should collect the residential collection box at the time that they return to the delivery unit if they pass the box or readily could pass the box on their return to the office. *Carriers may collect boxes that are not on their route, if appropriate.*
- i) The collection times should be staggered on collection routes so that the collection time shown on the label will be the latest possible time consistent with not being collected early. *Residential boxes should be collected no earlier than 20 minutes prior to the collection.* Time decal boxes should be staggered perhaps in even 5 or 10 minute intervals, particularly on the final collection of the day. Having all of the 5 PM boxes marked at 5 PM [when the actual collection time might be as late as 6 PM] is inappropriate. Likewise, having all of the residential boxes marked at the time that the letter carrier leaves the office is also inappropriate.
- j) *In addition to the boxes at post office facilities, all boxes which develop an average of 100 pieces on a weekday must be collected at 5 PM or later. The 100-piece average is the sum of all collections made on a given day at all collocated boxes. Having multiple boxes at the same location as well as having multiple collections prior to 5 PM is a reasonable likelihood that these boxes must be assumed to meet the 100-piece level.*
- k) Within the city delivery area of a post office, a mailer should not have to travel more than one-half mile to a residential box and 2 miles to a time decal box.
- l) Saturday collections must be made from all collection boxes except those that may be in a locked building or facility and therefore not accessible by the collector. This includes boxes which are located in buildings that are accessible. The volume of mail developed on a Saturday does not eliminate the need for the collection.
- m) All collections which are shown on a collection box for a given day must result in the mail being dispatched on that day. This would mean that mail destined for the overnight area would be delivered on the following day, for the second day delivery area on the second day, etc.
- n) Collection boxes with Holiday collections should indicate what holidays it either applies to or does not apply to. This would not apply if collections are made on all holidays. Marking a box with a holiday collection time and then only collecting it on "minor" holidays is inappropriate.

- o) An accessible collection box must be located at all Processing and Distribution Centers that will be collected as late as possible. The earliest possible time would probably be just before the earliest possible time that the last mail arrives from the associated offices and completes the initial culling operation.
- p) All collocated boxes must be collected at all times that a collection is made from any of the boxes. If this would be service affecting, that should be noted on the collection label [for example, if the regular box was collected at 5 PM and 7 PM and the collocated Express Mail box was only collected at 5 PM because the 7 PM collection would not meet service standards, there should be a 7 PM collection made along with a remark that it may not meet service standards - otherwise a First-Class Mail letter mailed at 6 PM could be delivered prior to an Express Mail letter deposited at the same time]. An exemption to this might apply if an Express Mail box was being collected and transported directly to the Airport Mail Center without going through the P&DC.
- q) All mail which is collected by city delivery, rural, and HCR carriers must be dispatched to the P&DC on the day it was collected from the route and arrive at the P&DC to achieve the delivery standards related to the date the carrier collected the mail from the customer. This appears to be more of a problem on a Saturday. For example, if I were to give my letter carrier a letter on Saturday when he/she delivers mail to my house, that mail must be processed by the P&DC on Saturday for delivery on Monday or Tuesday. This would also mandate a later collection time on Saturday at the box located in front of the facility that the carriers operate out of since their mail is being dispatched anyway.
- r) Collection "box" labels or other appropriate signs should be posted on lobby drops inside of a postal facility.
- s) The collection times for the lobby drop located inside a postal facility and for the collection boxes located outside of the same facility should be the same times. This removes the confusion that would exist if they were different and it meets the requirement that both be as late as possible. The only exception would be that the lobby drop's last collection should be shown as the closing time of the lobby if that is earlier than the outside time.
- t) Very clear signs should be required in those instances where window service is provided after the collection time for the final dispatch of the day.
- u) Time decals are required to be affixed on all boxes which have a 5 PM or later collection on a weekday.
- v) There are no restrictions about placing collection boxes in transportation terminals.

DBP/USPS-5 [a] Provide copies of any Headquarters directives that have been furnished to the field with respect to collection requirements in the past three years. [b] Please provide copies of any Inspection Service or OIG audits on collection service that have been conducted in the past three years.

DBP/USPS-6 Provide copies of any guidance that has been provided to District Managers with respect to the applicability of the requirements for collection boxes at non-city delivery offices.

DBP/USPS-7 [a] Please explain why the regulations for having retail window service on Saturday at a post office [independent offices as opposed to a station or branch] require that the Postmaster demonstrate that there is a need for Saturday service rather than making a demonstration that it is not needed. [b] Provide copies of any Headquarters directives that have been furnished to the field with respect to whether or not Saturday window service should be provided.

DBP/USPS-8 To evaluate the level of service that is being provided at post offices on Saturday, particularly those which do not have retail window service that day, please confirm, or explain and discuss if you are not able to fully confirm and/or provide any change which will make the indicated statement correct, each of the following:

- a) If there are Post Office Boxes at the facility, the public must have access to them on a Saturday.
- b) This access must include the ability of picking up mail on Saturday which is not placed into the physical box, such as oversize or accountable mail and this is known on a formal basis to the public such as by the posting of a sign.
- c) If there is incoming mail to the facility on Saturday, this mail must be placed into the post office boxes on Saturday in a similar manner as it is on other days.
- d) Other delivery customers, such as city delivery, rural, HCR, and General Delivery customers, must have the ability to pick up mail on Saturday and the delivery notice, if any, must indicate this availability.
- e) A sign must be posted at the facility to indicate this availability to call for mail so that the customer will realize that while window service is not available, pick-up service is available on Saturday.

- f) All mail which is collected on Saturday by city delivery, rural, or HCR carriers from customers along their delivery routes will be dispatched to the P&DC for processing on Saturday?
- g) Customers who have a mail article weighing over one pound with the postage paid by means of postage stamps will have the ability to present the article at the Post Office for dispatch on a Saturday.
- h) Those facilities that do not have retail window service must post signs, visible from outside, advising customers where window service may be obtained?

DBP/USPS-9 The reverse side of the Customer Copy of the Express Mail receipt Label 11-B provides the conditions for refunding the postage for those instances where overnight delivery is scheduled and is not accomplished. [a] Does this also apply to Second Day Express Mail where delivery is not accomplished by the second day after mailing? If so, why doesn't the receipt indicate so? [b] The back of the receipt indicates that refunds will not be made when detention was made for a law enforcement purpose. What types of activities would fit into that category? What section of the DMM authorizes that additional condition?

DBP/USPS-10 May Express Mail [Next Day and Second Day Service] be mailed at all postal facilities within all of the ZIP Codes listed on pages 11-34 through 11-36 of the 2001 National Five-Digit ZIP Code and Post Office Directory, other than the three specific ranges shown as military - main offices, stations, branches, rural carriers, and other points at which other classes of mail may be tendered - during their normal office hours? If not, provide any exceptions either by category or by specific office[s].

DBP/USPS-11 May Express Mail [Next Day and Second Day Service] be addressed to all valid addresses within all of the ZIP Codes listed on pages 11-34 through 11-36 of the 2001 National Five-Digit ZIP Code and Post Office Directory, other than the three specific ranges shown as military? If not, provide any exceptions either by category or by specific office[s].

DBP/USPS-12 [a] Confirm, or discuss and explain if you are unable to do so, that all postal facilities that accept Express Mail as noted in the response to DBP/USPS-10 have a listing of those 3-digit ZIP Code prefixes for which Next Day delivery will be achieved. [b] Confirm, or discuss and explain if you are unable to do so, that all postal facilities that accept Express Mail as noted in the response to DBP/USPS-10 have a cutoff time, established by the

Postmaster by which Express Mail must be presented to achieve Next Day delivery. [c] Must there be a reasonable minimum amount of time from the opening of the retail window service to the cutoff time to allow for mailers to deposit Express Mail on that day in order to achieve Next Day delivery? If not, why not? [d] If a facility has an cutoff time as noted in DMM E500.5.3 for Next Day service that is after 5 PM, must the time noted in DMM E500.6.2 for Second Day service be equal to or later, but not earlier than, the Next Day cutoff time? If not, why not? [e] Confirm, or discuss and explain if you are unable to do so, that an Express Mail article may be mailed at any facility noted in response to DBP/USPS-10 at any time that there are retail window service hours.

DBP/USPS-13 [a] With respect to whether or not the Next Day Service will be achieved by 12 Noon or 3 PM, is this a function of the dispatching office, the delivery office, or both? [b] What criteria are utilized to make this determination? [c] Does it apply all days of the year? If not, what are the exceptions? [d] Does the same time of the day apply equally to Next Day and Second Day service? If not, please explain.

DBP/USPS-14 For this interrogatory, the following assumptions apply:

1. The article will be deposited at a facility as noted in the response to DBP/USPS-10.
2. The article will be addressed to an address noted in the response to DBP/USPS-11.
3. The window hours for this post office are 8 AM to 6 PM.
4. The cutoff time for Express Mail Next Day Delivery service is 2 PM.
5. The list refers to those 3-digit ZIP Codes that are designated for overnight service.
6. The time of 10 AM was chosen to represent a time both before the 2 PM cutoff time and before 5 PM as noted in DMM Section E500.6.2 and can be as early as 12:01 AM; the time of 3 PM was chosen to be after the 2 PM cutoff time but before the 5 PM as noted in DMM E500.6.2 and before the close of window service hours or other ability to mail the article and may be as late as 12 Midnight; the time of 5:30 PM was chosen to be after the 5 PM as noted in DMM E500.6.2 and after the 2 PM cutoff time but before the close of window service hours or other ability to mail the article and may be as late as 12 Midnight. [If the choice of time is significant, please explain in your response]
7. All articles are mailed on Day 0 which for convenience will be noted as Monday [if the choice of day is significant, please explain in your response] Please confirm, or explain and discuss if you are unable to confirm, that articles mailed as noted will receive a refund if they

are not delivered by the time shown [other than for the exceptions shown in DMM E500.5.3 and 6.2]:

[a] Mailed Monday at 10 AM destined for an office on the list - will be delivered by 12 Noon or 3 PM Tuesday.

[b] Mailed Monday at 3 PM destined for an office on the list - will be delivered by 12 Noon or 3 PM Wednesday.

[c] Mailed Monday at 5:30 PM destined for an office on the list - will be delivered by 12 Noon or 3 PM Wednesday.

[d] Mailed Monday at 10 AM destined for an office that is not on the list - will be delivered by 12 Noon or 3 PM Wednesday.

[e] Mailed Monday at 3 PM destined for an office that is not on the list - will be delivered by 12 Noon or 3 PM. Wednesday.

[f] Mailed Monday at 5:30 PM destined for an office that is not on the list - will be delivered by 12 Noon or 3 PM Wednesday.

DBP/USPS-15 [a] Confirm, or explain if you are unable to do so, that Express Mail will be delivered all 365/6 days a year. [b] Confirm, or explain if you are unable to do so, that Express Mail may be addressed to any authorized type of address, including, but not limited to, city delivery street address, post office box, General Delivery, Rural Route / HCR Route in the RR 2 Box 123 format, and Rural Route / HCR Route in the city delivery type format [123 Main St].

DBP/USPS-16 [a] Confirm, or explain if you are unable to do so, that for Express Mail articles other than those addressed to a Post Office Box or General Delivery, an actual physical attempt at the addressee's location must be made prior to the guaranteed time or it will be considered a failure [and thus a refund of postage may be obtained] unless it meets one of the two exemptions in DMM Section E500.5.3/6.2 a and b. [b] Confirm, or explain if you are unable to do so, that Express Mail which is addressed to a Post Office Box or General Delivery will constitute a failure if the addressee does not have access to the post office box and/or the ability to claim the article such as might occur if the box section was closed or the notice of arrival was placed in the box but it was not possible for the addressee to claim the mail. [c] Confirm, or explain if you are unable to do so, that contacting an addressee by telephone or by requiring an addressee to pick up their Express Mail at a facility would constitute a failure [other than PO to PO service]. [d] May Post Office to Post Office Service be sent to all post

offices in the areas as noted in response to DBP/USPS-11? If not, provide a listing of all offices to which it may be sent. [e] Confirm, or explain if you are unable to do so, that the guaranteed delivery times for both PO to Addressee and PO to PO will be the same areas - both overnight and second day. [f] Clarify DMM Section E500.6.4 - if a PO-PO Express Mail article is sent to a second day area on a Saturday, will delivery be guaranteed on Monday or Tuesday [assume the delivery office is closed on Sunday and open the other six days of the week - is delivery made on the second business day after mailing - Tuesday in this case - or is it delivered on the first business day which is on or after the second day - Monday in this case]?

DBP/USPS-17 With respect to the delivery of Express Mail, do regulations or Headquarters directives mandate each of the following and/or discuss its applicability [please provide copies of the directives and/or citation of the regulation]: [a] Should delivery be made as early as convenient or is anytime prior to the guaranteed delivery time satisfactory? [b] Should city delivery carriers deviate from their routes to achieve delivery prior to the guaranteed delivery time? [c] Should rural/HCR carriers deviate from their routes to achieve delivery prior to the guaranteed time?

DBP/USPS-18 With respect to the proper completion of PS Form 3811, Return Receipt, [a] Confirm that the name of the person signing the receipt should be printed in Part A. [b] Confirm that the date of delivery should be entered in Part B. [c] Confirm that the date of the month alone is not a satisfactory entry for the Date of Delivery. [d] Confirm that the month and the date of the month alone is not a satisfactory entry for the Date of Delivery. [e] Confirm that the Date of Delivery must include a month, date, and year to be correct. [f] Please confirm that one of the two boxes in Part C, namely Agent or Addressee, must be checked in all instances. [g] Please confirm that one of the two boxes in Part D, namely Yes or No, must be checked in all instances. [h] Confirm that a mailer, such as myself, would be required to pay \$1.50 to obtain a return receipt service on each Certified Mail letter that was mailed. [i] Confirm that the printed name box may add to the value of the return receipt service depending on the needs and requirements of the mailer. [j] Confirm that the Date of Delivery information may add to the value of the return receipt service depending on the needs and requirements of the mailer. [k] What is the period of time that the Postal Service will maintain delivery records for accountable mail? [l] Confirm that once the period of time provided in response to Subpart [k] has passed, it will not be possible for the Postal Service to advise

whether a return receipt card with the Date of Delivery shown as 2-11 was February 11, 1997, 1998, or for that matter any given year [other than the dates that fall within the times shown in response to Subpart [k] - assuming that the delivery receipts and the appropriate search have been properly completed]. [m] Confirm that having an accurate date of delivery shown on the return receipt may add to the value of the return receipt service depending on the needs and requirements of the mailer. [n] Confirm that the status of the signer, Agent or Addressee, information may add to the value of the return receipt service depending on the needs and requirements of the mailer. [o] Confirm that the checking of the Yes or No box in Part D may add to the value of the return receipt service depending on the needs and requirements of the mailer. [p] Confirm that the Yes or No box in Part D was established so that a mailer would have a positive notation that the delivery address was or was not the same as the address the article was addressed to, namely, without the Yes/No box, no new address shown could either mean that the article was delivered as addressed or the new address was not shown as required. [q] Confirm that a mailer utilizing return receipt service would normally have to assume, unless there was contradictory evidence such as the card showing a date of delivery before the date of mailing or showing a date of delivery after the card was received back, that the date of delivery as shown on the return receipt card was correct. [r] Is a mailer who receives an improperly completed card entitled to a refund of the return receipt fee? If not, why not? [s] What action should a mailer take if the return receipt is returned without being properly completed? [t] Confirm that a mailer may obtain a Duplicate Return Receipt when a return receipt is either not received or is received without being properly completed. [u] Please explain the procedure, in detail, that a mailer must follow to obtain a duplicate. [v] Confirm that a mailer has the option of either mailing a Certified Mail letter at a post office for postmarking the receipt or just mailing the letter without obtaining a mailing receipt. [w] Confirm that once the latter has been mailed, either with or without getting the receipt postmarked, the letter is processed and delivered the same way. [x] Confirm that a mailer who requests a Duplicate Return Receipt will be able to obtain it without payment if he is able to present a postmarked receipt that shows that a return receipt was paid for at the time of mailing. [y] Confirm that a mailer who requests a Duplicate Return Receipt will be able to obtain it by making a payment if he is unable to present a postmarked receipt that shows that a return receipt was paid for at the time of mailing. [z] Confirm that many mailers may not realize the importance of having the mailing receipt postmarked to save the potential cost of a duplicate return receipt [aa] Confirm that the necessity of obtaining a duplicate return receipt will reduce the value of service to most mailers. [bb] Are return receipts checked by a postal

employee before they are returned to the mailer? [cc] If so, please advise the items which are checked? [dd] Would proper checking of return receipts eliminate the problems with return receipts? If not, why not? [ee] What percentage of all return receipts receive this post delivery checking? [ff] Please explain and discuss any subparts you are not able to confirm.

DBP/USPS-19 [a] Confirm, or explain if you are unable to do so, that when delivering a Certified Mail article, that the delivery employee must obtain a single signature from the addressee on the Postal Service delivery record [irrespective of whether there is a single article to deliver this way or multiple articles for delivery on some form of manifest]. [b] Confirm, or explain if you are unable to do so, that when delivering a Certified Mail article which contains a Return Receipt, that the delivery employee must obtain two separate signatures from the addressee, one on the Postal Service delivery record [irrespective of whether there is a single article to deliver this way or multiple articles for delivery on some form of manifest] and the second on the Return Receipt card PS Form 3811. [c] Confirm, or explain if you are unable to do so, that when delivering a Return Receipt for Merchandise article, that the delivery employee must obtain two separate signatures from the addressee, one on the Postal Service delivery record [irrespective of whether there is a single article to deliver this way or multiple articles for delivery on some form of manifest] and the second on the Return Receipt card PS Form 3811. [d] Confirm, or explain if you are unable to do so, that the time and therefore costs for obtaining both signatures for Return Receipt for Merchandise service are charged to that service since there is a single fee. [e] With respect to a Certified Mail - Return Receipt Requested article, how are the time and costs allocated between the two separate services? [f] Explain the rationale for such an allocation. [g] Confirm, or explain if you are unable to do so, that the time that it takes to obtain the second signature will usually be less than the time that it takes to get the first signature, or in general, the time that it takes to obtain both signature will be less than twice the time to obtain only one signature.

DBP/USPS-20 [a] Confirm, or explain if you are unable to do so, that effective June 8, 1997, the service for return receipts changed requiring the delivery employee to indicate the address of delivery if different from the address on the mailpiece. [b] Confirm, or explain if you are unable to do so, that the service available on June 8th represents a difference in the service that was provided at the basic fee on June 7th. [c] Other than the mention on Page 9 of the May 22, 1997 Postal Bulletin, provide references and copies of all directives issued by Headquarters notifying the field of this change. [d] Has the Postal Service conducted any

tests to determine the level to which the field is complying with the requirements to provide an updated address when appropriate? [e] If so, provide details and results of the tests. [f] If not, explain why not including reasons why one would consider Return Receipt service to be a quality service, particularly with respect to providing customers with updated addresses.

DBP/USPS-21 [a] Confirm, or explain if you are unable to do so, that Section 822.111 of the Postal Operations Manual [POM] requires that the delivering carrier or window clerk will obtain the signature or authorized signature stamp of the recipient of an article utilizing the Return Receipt Service. [b] Confirm, or explain if you are unable to do so, that POM Section 822.111 also requires the delivery employee must complete the date of delivery if the addressee has not already done so. [c] Would it be reasonable to expect the delivery employee to check to ensure that the Return Receipt has been properly signed? [d] Would it be reasonable to expect the delivery employee to check to ensure that the Return Receipt has the name of the addressee printed in addition to the signature? [e] Would it be reasonable to expect the delivery employee to check to ensure that the Return Receipt has the correct date of delivery entered on it? [f] Would it be reasonable to expect the delivery employee to check to ensure that the Return Receipt has been properly completed? [g] Would it be reasonable to expect the delivery employee to make any necessary corrections to the information provided on the return receipt? [h] Explain any negative answers to subparts c through g. [i] Will the delivery employee referenced in POM Section 822.111 always be an employee of the United States Postal Service? [j] If your response to subpart h is not an unqualified yes, list all examples and instances in which the delivery employee will not be a USPS employee. [k] Do the requirements of POM Section 822.111 apply to the necessity of having the delivery employee ensure that the Return Receipt is completed at the time of delivery [the time at which the custody of the mail is transferred from the control of the United States Postal Service to the control of the addressee]? [l] If not, explain any instances in which it is not required. [m] Do the requirements of POM Section 822.111 apply to the necessity of having the delivery employee ensure that the Return Receipt is completed at the time of delivery with respect to all agencies, departments, or organizations of the federal government? [n] Same as subpart [m] except with respect to those of any state or local government. [o] Same as subpart [m] except with respect to delivery to any non-government addressee. [p] Do the requirements of POM Section 822.111 apply to the necessity of having the delivery employee ensure that the Return Receipt is completed at the time of delivery regardless of the number of return receipts that are involved in the delivery? [q] Explain and list any instances with respect to any negative

answers to subparts [m] through [o]. [r] Confirm, or explain if you are unable to do so, that the delivering employee will be required in all instances to determine if the delivery address differs from the original address shown on the article and if so to provide the new address on the Return Receipt card. [s] Confirm, or explain if you are unable to do so, that the delivering employee will be required in all instances to determine if the delivery address differs from the original address shown on the article and if not to check the box on the return receipt card to indicate that the article was delivered to the same address as originally addressed. [t] Confirm, or explain if you are unable to do so, that the requirements specified in subparts r and s will apply to all types of addressees including, but not limited to, those types mentioned in subparts m through o. [u] Confirm, or explain if you are unable to do so, that the delivering employee will be required in all instances to give all return receipts to the clearing clerk daily. [v] Confirm, or explain if you are unable to do so, that subpart u means that for all return receipts which are being requested for mail which is delivered on a given day will be turned over to the clearing clerk that same day. [w] Confirm, or explain if you are unable to do so, that the requirements specified in subpart u will apply to all types of addressees including, but not limited to, those types mentioned in subparts m through o.

DBP/USPS-22 [a] Confirm, or explain if you are unable to do so, that Section 822.112 of the Postal Operations Manual requires that the clearing clerk must evaluate all return receipts that have been turned in to ensure that they are properly completed. [b] Would it be reasonable to expect the clearing clerk to check to ensure that the Return Receipt has been properly signed? [c] Would it be reasonable to expect the clearing clerk to check to ensure that the Return Receipt has the name of the addressee printed in addition to the signature? [d] Would it be reasonable to expect the clearing clerk to check to ensure that the Return Receipt has the correct date of delivery entered on it? [e] If there are any instances where the return receipt is not given to the clearing clerk on the date of delivery, explain how the clearing clerk would be aware of the date of delivery? [f] Would it be reasonable to expect the clearing clerk to check to ensure that any requirements for restricted delivery have been complied with? [g] Would it be reasonable to expect the clearing clerk to check to ensure that any requirements for notifying the sender of a new address have been complied with? [h] Would it be reasonable to expect the clearing clerk to check to ensure that any requirements for notifying the sender that there is no new address [namely, the box has been checked to show this] have been complied with? [i] What corrective action should the clearing clerk take if in evaluating a return receipt it is noticed that 1. the card is not properly signed, 2. the name of the person

signing has not been properly printed, 3. the correct date of delivery has not been shown, 4. the restricted delivery requirements have not been complied with, 5. a new address has not been provided when there is one, or 6. the box has not been checked when there is no new address. [j] Confirm, or explain if you are unable to do so, that all return receipts must be mailed [namely, placed into the mail stream for processing and transporting and delivery to the sender] no later than the first workday after delivery. [k] Explain why POM Section 822.112 does not require that the clearing clerk mail the return receipt card on the date of delivery rather than allowing it to be held until the next workday. [l] Confirm, or explain if you are unable to do so, that the requirements specified in subparts b through j will apply in all instances regardless of the type of addressee or the number of return receipts involved. [m] Confirm, or explain if you are unable to do so, that the clearing clerk referenced in POM Section 822.112 is an employee of the United States Postal Service.

DBP/USPS-23 With respect to the utilization of other than a signature by hand on the return receipt card, confirm or explain if you are unable to do so, that POM Section 822.2 requires that, [a] In those cases where the article is addressed to a federal or state official or agency, a rubber stamp showing the name of the agency or organization may be utilized. [b] This rubber stamp must show the name of the agency or organization and not just the name of an individual. [c] The ability to utilize a printed rubber stamp or other automated means [as opposed to one which has a facsimile of a written signature of an individual] may only be used by a federal or state agency. [d] A federal agency is one in which the employees of the agency are employees of the United States Government. [e] A state agency is one in which the employees of the agency are employees of one of the 50 states of the United States of America. [f] This provision does not apply to other governmental agencies such as, multi-state agencies, counties, municipalities, school districts. [g] This provision does not apply to companies or other non-governmental agencies. [h] For all addressees other than federal and state agencies, the rubber stamp or other automated means must include a facsimile, hand-written signature of the individual who is authorized to accept accountable mail. [i] The type of addressee noted in subpart h may not utilize a rubber stamp or other automated means which contains printed information only [such as the name of the agency]. [j] Explain any non-confirmations.

DBP/USPS-24 [a] Confirm that on August 1, 1996, Sandra D. Curran, Acting Manager, Delivery, sent a letter to all District Managers - Subject: Failure to Obtain Signature on PS

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

DBP/USPS-25 [a] Bottom line, is it a requirement of the United States Postal Service that all accountable mail, including any return receipts that are associated with the mail piece, be signed [this includes the use of a signature stamp under the provisions of POM Section 822.2] for by the addressee at the time of delivery [namely, when the control of the mail piece transfers from the United States Postal Service to that of the addressee] and that the requirements for the completion of the return receipt also be completed at the time of delivery in accordance with the provisions of POM Section 822 and that this applies to any and all addressees throughout the United States who might receive accountable mail and also applies regardless of the quantity of mail involved. [b] If your response to subpart a is not an **unqualified** yes, provide a complete listing of all exceptions to the requirement and the authority authorizing that exception. [c] Confirm, or explain if you are unable to do so, that the cost for a return receipt is presently \$1.50 and that this charge will apply for each separate accountable mail piece for which return receipt service is desired. [d] Confirm, or explain if you are unable to do so, that should there be 10,000 accountable mail pieces requesting return receipt service being delivered to a single addressee on a given day that each of the senders paid a fee of \$1.50 for the return receipt and that the total revenue received by the Postal Service for processing all ten thousand return receipts will be \$15,000. [e] Confirm, or explain if you are unable to do so, that, on average when there is more than one return receipt involved for a given addressee, the average cost for processing each single return receipt will be less than the cost that would be entailed if the addressee only received a single mail piece

requesting return receipt service. In other words, if the cost for handling a single return receipt on average was fifty cents, then the total cost for handling 100 return receipts for a single addressee at one time would be less than fifty dollars [resulting in an average cost of less than fifty cents each]. [f] Do the cost figure for return receipt service take into account the potential savings in delivering multiple pieces at the same time?

DBP/USPS-26 In order to determine that the Return Receipt service provides a value to the mailer, [a] Enumerate and provide details of all studies and tests that have been performed or conducted by the Postal Service in the past eleven years [since Docket R90-1] to determine the mailing public's needs and desires for return receipt service. [b] Same as subpart a except to determine the quality of service being received by return receipt users. [c] Same as subpart a except to determine the extent to which the return receipt service is being provided as mandated in the regulations. [d] Explain why the responses to subparts a through c indicate that the Postal Service is making a concerted effort to provide a quality service. [e] Confirm, or explain if you are unable to do so, that one of the purposes of the return receipt is to provide evidence of delivery to the sender and that this evidence is being provided by an independent third party, namely the Postal Service. [f] Confirm, or explain if you are unable to do so, that the Postal Service used to apply the red validating stamp to return receipts and that this procedure was terminated. [g] When and why was the use of this procedure terminated and provide copies of the directive doing so? [h] Wouldn't the date on the red validating stamp be more likely to be correct than a date that was handwritten? [i] Wouldn't the presence of the red validating stamp on the return receipt provide a greater level of authenticity of the return receipt than one without it? [j] Explain any negative responses to subparts h and i particularly in light of the desire to provide a quality product. [k] Confirm, or explain if you are unable to do so, that the application of a red validation stamp impression on a return receipt by other than an authorized Postal Service employee would be a violation of the law. [l] Are there any plans to resume the use of the red validating stamp? [m] Confirm, or explain if you are unable to do so, that there are times when the actual date of delivery is significant to the mailer utilizing return receipt service. [n] Confirm, or explain if you are unable to do so, that there are times when name of the recipient is significant to the mailer utilizing return receipt service. [o] Confirm, or explain if you are unable to do so, that there are times when prompt notification of delivery is significant to the mailer utilizing return receipt service. [p] Confirm, or explain if you are unable to do so, that provision of the return receipt as proof of delivery and proof of delivery date having been furnished by an independent, disinterested third party, such

as the Postal Service, is significant to the mailer at times. [q] Confirm or explain if you are unable to do so, that failure of the Postal Service to process return receipts in the manner specified in the regulations may increase the likelihood of a decrease in value to the mailer who is expecting one of the services noted in subparts m through p.

DBP/USPS-27 DMM Section S915.1.6 states, Return receipt fees are refunded only if the USPS fails to furnish a return receipt. May a refund be claimed for the following: [a] The return receipt which is received back is not signed. [b] The return receipt which is received back does not have the printed name of the recipient. [c] The return receipt which is received back does not show a date of delivery. [d] The return receipt which is received back shows an incorrect date of delivery. [e] The return receipt which is received back does not show a new address where delivered when there is one. [f] The return receipt which is received back does not have the box checked to show that there was no change of delivery address. [g] The return receipt which is received back was mailed by the delivery office later than the next business day following delivery. [h] The return receipt which was received back utilizes a rubber stamp or other automated signature which does not meet the requirements of POM Section 822.2. [i] There is evidence that the accountable mail was delivered to the addressee to complete the return receipt at a later, more convenient time and therefore the return receipt was not obtained by the Postal Service at the time of delivery. [j] The return receipt is not received. [k] A duplicate return receipt indicates that the article was not delivered. [l] The article is returned by the Postal Service without delivery. [m] Confirm, and explain if you are unable to do so, that the referenced DMM section also implies that the return receipt which is furnished meets the requirements of the Postal Service. [n] Explain any of the items for which a refund of the return receipt fee would not be authorized. [o] Confirm, or explain if you are unable to do so, that the necessity of a sender to request a duplicate return receipt just to fix a problem caused by the improper completion of the original return receipt will reduce the value of the service to the mailer.

DBP/USPS-28 [a] How many of the mail processing facilities are now fully equipped with a device which will automatically "trap" a Certified Mail article by the presence of the phosphor ink on the Certified Mail label? [b] How many of the mail processing facilities are partially equipped with such a device? [c] How many of the mail processing facilities are not equipped with such a device? [d] What percentage of the mail is processed through a machine equipped with such a device. Note: Subparts a through c refer to the number of facilities and

subpart d refers to the percentage of mail. [e] If there are any facilities listed in response to subparts b or c or if the response to subpart d is not 100%, provide an implementation schedule as to when that level will be achieved. [f] Confirm, or explain if you are unable to do so, that if there are any facilities which do not have such a device installed then there is an increase in the likelihood that the mailer may not receive the Certified Mail service that was requested. [g] If your response to subpart f is negative, then what purpose is achieved by installing these devices? [h] If you are able to confirm subpart f, explain how the failure to have all facilities equipped with this device can be reconciled with providing a quality service with value to the mailer.

DBP/USPS-29 [a] Confirm, or explain if you are unable to do so, that when accountable mail is delivered, the addressee will be required to sign for the receipt of the mail utilizing either a single receipt form, manifest delivery form, or other computerized listing of the type and number of each accountable mail article. [b] Confirm, or explain if you are unable to do so, that this signature will always be a hand signature. [c] If not, provide the authority [and furnish a copy] which authorizes the delivery without a hand signature. [d] Confirm, or explain if you are unable to do so, that this record of delivery will be maintained in the post office of delivery. [e] Confirm, or explain if you are unable to do so, that these records will be discarded after a period of time. [f] What is the authorized time after which these records may be discarded? [g] Confirm, or explain if you are unable to do so, that a mailer who has a return receipt may receive confirmation of its validity by having the delivery office utilize the delivery record and provide this confirmation. [h] How would such confirmation be accomplished? [i] Confirm, or explain if you are unable to do so, that once the delivery records have been discarded, there will be no record of delivery maintained in the Postal Service. [j] Confirm, or explain if you are unable to do so, that once the delivery record retention period has passed and the records discarded, the mailer may no longer obtain confirmation of the validity of the return receipt. [k] Confirm, or explain if you are unable to do so, that the inability of a mailer to obtain confirmation of the validity of the return receipt could potentially reduce the value of the service to the mailer. [l] Confirm, or explain if you are unable to do so, that the use of the red validating stamp on the return receipt could mitigate or eliminate this potential loss of the value of the service.

DBP/USPS-30 [a] Confirm that the definition for Stamped Cards appears in DMCS section 962.11. [b] Confirm that a Stamped Card is a card. [c] Confirm that a card is a paper

product of uniform thickness of between 0.007 and 0.016 inches, a length of between 5 and 6 inches, and a width of between 3-1/2 and 4-1/4 inches. [d] Confirm that a Stamped Card has postage imprinted or impressed on it. [e] Confirm that a Stamped Card is supplied by the Postal Service. [f] Confirm that a Stamped Card is used for the transmission of messages. [g] Explain any nonconfirmations.

DBP/USPS-31 [a] Confirm that the United States Postal Service issued in October 2001 a card with a 21-cent Santa Claus stamp on the front and a picture of Santa Claus on the reverse. [b] Confirm that these were supplied in a cellophane wrapped pack of twenty cards. [c] Confirm that the price tag on the back of the package states, "SANTAS / 20 POSTAL STAMPED CARDS / ITEM NO. 883100 / PRICE \$9.25 / AIC 092. [d] Confirm that there is a gold seal on the front of the package that states, READY-TO-MAIL / POSTAL STAMPED CARDS. [e] Confirm that the former name for Stamped Cards was Postal Cards. [f] Confirm that there was / is no difference between the definition for Stamped Cards and Postal Cards. [g] Looking at one of the single cards out of the package of twenty, confirm that it is a card. [h] Confirm that this single card meets all of the dimensional standards listed in DBP/USPS-30 subpart c. [i] Confirm that this single card has 21 cents in postage imprinted or impressed on it. [j] Confirm that 21 cents is the postage rate for stamped cards. [k] Confirm that these cards are supplied by the Postal Service. [l] Confirm that these cards may be used for the transmission of messages. [m] Confirm that Fee Schedule 962 presently provides for a fee of \$0.02 in addition to postage for a Stamped Card. [n] Confirm that a Stamped Card which has 21 cents postage imprinted or impressed on it should be sold under the provisions of Fee Schedule 962 for a price of \$0.21 plus \$0.02 or a total price of \$0.23. [o] Confirm that the present price for twenty cards would be ten times the price of one card or a total of \$4.60. [p] Confirm that a price of \$9.25 exceeds \$4.60. [q] Explain any nonconfirmations. [r] What is the legal authority for the sale of the above referenced Santa cards at a price which exceeds that authorized in Fee Schedule 962? [s] **In general**, may a refund be obtained by those who have paid a price in excess of that which is authorized in the DMCS? [t] If no, explain and elaborate on any instances where it may not be. [u] Specifically, with respect to the purchase of Santa cards, may a refund be obtained by those who have paid a price in excess of that which is authorized in the DMCS? [v] If not, explain why not. [w] Confirm that one of the provisions of Title 18, United States Code, Section 1721 relates to the price at which postal cards may be sold. [x] If not, explain why not. [y] Has the Postal Service made any requests to Congress or anyone else for a change in the wording of 18 USC 1721? [z] If so, indicate

the change that was requested and the date of the request. [aa] Provide a complete listing of all cards that have been sold by the Postal Service since 1971 at a price which exceeds the price of the postage that was imprinted or impressed on them. Provide the date of issue, the subject matter of the card, the value of the postage that was imprinted or impressed on the card, the selling price per card, the number of cards in the set, the total selling price of the set, and the total number of cards or sets that were sold to the public. [bb] With respect to the purchase of cards noted in response to subpart aa, may a refund be obtained by those who have paid a price in excess of that which is authorized in the DMCS and/or 18 USC 1721? [cc] If not, explain why not?

DBP/USPS-32 The following interrogatories are related to determining how revenue and expenses which apparently are not related to matters under the jurisdiction of the Postal Rate Commission enter into the rate evaluation. [a] For example, how are any profits [revenue minus expense] from such items as International Mail, Philatelic Products, Phone Cards, Money Cards, and sale of merchandise ranging from Fathers Day cards to Bugs Bunny ties taken into account? [b] Do any profits go into the total postal revenues thereby reducing the total amount that must be recovered from postage charges?

DBP/USPS-33 [a] For each of the past five years, what were the total revenue and expenses for International Mail? [b] For each of the past five years, what were the total revenue and expenses for the sale of Phone Cards and Money Cards? [c] For each of the past five years, what were the total revenue and expenses for the sale of the various items of merchandise as noted above?

DBP/USPS-34 With respect to the Philatelic Products, [a] for each of the past ten years, what were the total revenue and expenses amounts related to it? [b] With respect to revenue amounts, what methods are utilized to determine the division of stamp sales between those that will be utilized to pay for mailing as opposed to those that will not be utilized? [c] What are the goals of the Postal Service with respect to the profit levels to be achieved from the sale of Philatelic Products?

DBP/USPS-35 With respect to the delivery of Post Office to Addressee Express Mail, [a] Provide information on the percentage of articles that are delivered by the guaranteed delivery time. Provide records for the past year or more. [b] Confirm that only the mailer [and not the

addressee] may make a postage refund claim for delivery made after the guaranteed time. [c] How many articles and what percentage are delivered later than the guaranteed time over the past year or more? [d] How many claims have been filed for return of postage for late delivery for the same time period as utilized in Subpart [c]? [e] Confirm that a mailer must take a specific action to determine that an Express Mail article was delivered late and that without this information will be unaware of the late delivery of the article. [f] Explain any reasons why the percentage of refunds is less than the total number of articles delivered late. [g] Please explain and discuss any subparts you are not able to confirm.

DBP/USPS-36 Provide a breakdown by volume and revenue showing the percentage of Priority Mail [a] that is transported in each of the following categories:

- [1] Direct [as opposed to a hub and spoke] surface transportation
- [2] Direct air transportation
- [3] Hub-to-spoke surface transportation
- [4] Fedex Network
- [5] Other Hub-to-spoke air transportation
- [6] Other methods of transportation [Break out and identify any which have 5% or greater volume or revenue]

[b] Provide a separate similar listing broken down by each of the separate zone rates, namely up to the 3rd zone, for the 4th zone, for the 5th zone, for the 6th zone, for the 7th zone, and for the 8th zone.

DBP/USPS-37 Please advise whether the Internal Revenue Service will accept as proof of mailing and/or delivery letters that are sent to them with each of the following services: [a] Certificate of Mailing [b] Certified Mail [c] Certified Mail / Return Receipt [d] Delivery Confirmation [e] Signature Confirmation [f] Express Mail. [g] Please provide any instructions or posters, in the past three years, which relate to the use of special services with respect to mail sent to the IRS.

DBP/USPS-38 In regard to the Service Commitments / performance goals for First-Class Mail, with regard to the delivery standards realignment that took place as a result of Docket N89-1 along with the experimental [which became permanent on September 23, 1989] realignment that took place prior to that in the Metropolitan New York City area, what percentage of the mail profile prior to that Docket and experiment shifted from [a] one-day to

two-day delivery, [b] one-day to three-day delivery, [c] two-day to one-day delivery, [d] two-day to three-day delivery, [e] three-day to one-day delivery, and [f] three-day to two-day delivery? [g] What were the purposes of this realignment? [h] Did this realignment result in an increase in or a savings of costs associated with the mail processing and transportation [or any other areas]? [i] If so, provide the yearly change in costs for each year since the change. [j] Did this realignment result in a change in the consistency of mail delivery? [k] If so, provide the data for each year since the change. [l] Have there been any changes in delivery standards since this experiment/docket? [m] If so, enumerate them. [n] Is there a specific request to the mailing public at regular intervals to inquire about potential changes desired in delivery standards? [o] If so, explain and provide details. If not, explain why not.

DBP/USPS-39 With respect to the delivery standards / commitments for First-Class Mail, I am interested in obtaining the criteria that are utilized to determine whether a given path will be committed for overnight, 2-day, or 3-day delivery. [a] Confirm that for any given ZIP Code pair [other than the military ZIP Codes] will be committed for delivery in three days or less. [b] Provide copies of any directives and guidelines that are utilized to determine those areas that fall into and or all of those three categories. [c] Provide the guidelines that are utilized to determine those offices that will be included in the area to receive overnight service. [d] Is the minimum area that is overnight an entire 3-digit ZIP Code prefix, namely, if A to B is overnight then it is also overnight to all facilities with the same 3-digit ZIP Code prefix as B? [e] If A to B is overnight, then will all offices that are served by the P&DC/P&DF serving B be overnight from A? [f] Must overnight service be reciprocal, namely if A to B is overnight, then B to A will also be overnight. [g] Provide the guidelines that are utilized to determine those offices that will be included in the area to receive 2-day service. [h] Is the minimum area that is 2-day an entire 3-digit ZIP Code prefix, namely, if A to B is 2-day then it is also 2-day to all facilities with the same 3-digit ZIP Code prefix as B? [i] If A to B is 2-day, then will all offices that are served by the P&DC/P&DF serving B be 2-day from A? [j] If A to B is 2-day, then will all offices that are served by the ADC serving B be 2-day from A? [k] Must 2-day service be reciprocal, namely if A to B is 2-day, then B to A will also be 2-day. [l] Must all offices within a given state be overnight or 2-day from anywhere within the same state? [m] Must all adjacent ZIP Code areas be either overnight or 2-day service? In other words, any two neighbors may not have 3-day service between them. [n] Is the minimum area that is 3-day an entire 3-digit ZIP Code prefix, namely, if A to B is 2-day then it is also 3-day to all facilities with the same 3-digit ZIP Code prefix as B? [o] If A to B is 3-day, then will all offices that are served by the

P&DC/P&DF serving B be 3-day from A? [p] If A to B is 3-day, then will all offices that are served by the ADC serving B be 3-day from A? [q] Must 3-day service be reciprocal, namely if A to B is 3-day, then B to A will also be 3-day. [r] Please indicate the guidelines that were utilized in Docket N89-1 along with any changes that have been implemented since then. In these guidelines, also indicate the minimum percentages of a facility's mail that would mandate a higher level of service. [s] Please discuss, explain, and provide appropriate data of any of the sub-parts d through q above that you are not able to provide an unqualified yes response.

DBP/USPS-40 [a] Confirm in general that air transportation will be more costly than surface transportation. [b] Confirm in general that air transportation will provide more expeditious service than surface transportation. [c] If not, explain. [d] Is air transportation utilized in all instances where it would advance the delivery time for First-Class Mail by one or two days over that which may be obtained by utilizing surface transportation in whole or in part? [e] If not, why not and explain how the handling of this mail could be considered to be handled expeditiously. [f] Provide copies of any regulations, directives, or memoranda issued at Area or above level which specify when to utilize air transportation service. [g] Provide copies of any press releases, directives, or other memoranda which were issued at the Headquarters level to indicate the level of service that would be provided to First-Class Mail at the time that Air Mail was eliminated as a separate domestic service some twenty years ago. [h] Does the level to which air transportation is utilized today match the level that was stated when Air Mail was eliminated as a separate service? [i] If not, explain how and why it does not.

DBP/USPS-41 In regard to the Service Commitments / performance goals for First-Class Mail, [a] do the delivery standards apply to all types of First-Class Mail regardless of whether it is a letter, card, parcel, flat, or other shape or type? [b] Do the delivery standards apply regardless of the method by which the article is addressed such as printed vs. handwritten? [c] Do the delivery standards apply regardless of whether the article has no ZIP Code or a 5- or 9-digit ZIP Code? [d] Do the delivery standards apply regardless of whether or not the article contains a 5-, 9-, or 11-digit barcode applied by the mailer? [e] Do the delivery standards apply regardless of any other services that are utilized such as Certified Mail, Registered Mail, COD, Insured Mail? [f] Do the delivery standards apply whether or not the postage is paid by stamps which require cancellation or by some other means, such as a postage meter, which does not require cancellation. [g] Are the EXFC results broken out by any sub-scores for

different characteristics of mail as noted in subparts a through f above? If so, provide results for the most recent period. [h] Elaborate and explain any negative answers.

DBP/USPS-42 [a] Is mail addressed to a government agency in Washington DC [ZIP Codes 202 through 205] included in the EXFC results for Washington DC? [b] If not, why not? [c] Have any studies been completed in the past three years to evaluate the delivery service to these agencies? If yes, please provide copies. If not, why not? [d] What special methods, if any, are utilized to process mail to these agencies. [e] Is the Postmaster at Washington responsible for the delivery of mail to these agencies? If not, please provide the name, title, and address of the responsible individual.

DBP/USPS-43 [a] Does the USPS have a requirement that all mail which is placed into the system on a given day will be postmarked that day and will be processed that same day? [b] Does the USPS have a requirement that all mail turned in over a service window that is open to the public will be postmarked that day and will be processed that same day? [c] Does the USPS have a requirement that all mail turned into a city delivery, rural, or HCR carrier or which is collected by a carrier will be postmarked that day and will be processed on that day? [d] Does this apply to all delivery dates including Saturday? [e] Explain and elaborate on any negative answers.

DBP/USPS-44 With respect to Express Mail tracking, [a] Indicate the points at which an Express mail article will be scanned, in the format of "acceptance to the mailing office", "arrival at the delivery office", etc. Distinguish between those points that are required and those that are optional. [b] How often and at what times are the results of the scan uploaded so that the information will be available to the public on the telephone or website? If necessary, provide separate information for different days of the week or otherwise.

DBP/USPS-45 With respect to return receipt service, [a] What percentage of the total volume of return receipts utilize a privately printed form? [b] Confirm that there is no cost to the Postal Service for the form when a mailer utilizes a privately printed form. [c] How is this savings calculated in your rate evaluation? [d] What percentage of the total volume of return receipts are mailed directly by the mailer without the need for window service? This should include both those instances where the mailer does not utilize any window service and those instances where the window service is related to one or more other services other than the

return receipt. [e] Confirm that there is no cost to the Postal Service for window service when a mailer directly mails his article. [f] How is this savings calculated in your rate evaluation? [g] If I mail a letter Certified Mail - Return Receipt how is the window time allocated between the mailing of the article itself, the activities related to the Certified Mail service, and the activities specifically related to the return receipt? Provide copies of any studies and raw data utilized to respond to this question. [h] What percentage of the letters that are mailed with a return receipt are returned to the sender as either undeliverable or unclaimed? [i] Confirm that there is no cost to the Postal Service for delivery or processing return receipt costs in this case. [j] How is this savings calculated in your rate evaluation? [k] What percentage of the total number of return receipts are not processed at the time of delivery but are completed by the addressee after delivery has been made, therefore requiring no intervention by the Postal Service at the delivery end other than to transport the mailed return receipt card back to the sender? [l] Confirm that, in the instance note in subpart k, there is no cost to the Postal Service at the delivery end other than for the cost of a post card back to the sender. [m] How is this savings calculated in your rate evaluation? [n] Is it permissible for a non-USPS recipient of articles containing return receipts to enter into an agreement with the delivering post office for the post office to complete all portions of the return receipt prior to or coincident with delivery or must the addressee complete the signature part at a minimum? In other words, the return receipt cards are removed by the post office and, in most cases, a rubber stamp or other automated means is utilized to "sign" the card without any intervention by the recipient. [o] If yes, what conditions and provisions apply and what section of the DMM/POM authorizes this method? [p] If yes, what percentage of the total return receipt volume are processed in this manner? [q] Confirm that the method described in subpart n will incur additional costs. [r] How is this added cost calculated in your rate evaluation?

DBP/USPS-46 [a] Confirm that the reverse side of the Customer Copy of Label 11-B for Express Mail starts off with the words "Service Guarantee" and uses the words "guaranteed time" two times in the body of the first paragraph. [b] Confirm that the Postal Service utilizes the word, or a derivative of the word, "guarantee" in its publicity and advertising of Express Mail. [c] What is the definition of the word "guarantee/guaranteed", or its derivative, as utilized in these respects? [d] Confirm that the word "guarantee", or its derivatives, when utilized by the Postal Service with respect to Express Mail means that the mailer will be guaranteed to get a refund of postage if the article is not delivered by the guaranteed time, as opposed to whether or not it will even be possible for the delivery to be made. [e] What percentage of the

Express Mail users in the country do you feel will believe that the use of the word guarantee, or its derivatives, will indicate that, barring a failure, delivery will be made by the guaranteed time? [f] Confirm that there are instances where a mailer of Express Mail will be provided a guaranteed delivery time at the time of mailing the article for which it will be impossible for the Postal Service to achieve. [g] Do you feel that this form of advertising is in the best interests of the customer? If so, please explain why? [h] If a private delivery service were to advertise *delivery by a guaranteed time when it was impossible to achieve that delivery time*, could that be considered false advertising? [i] Is the Postal Service exempt from complying with the Truth in Advertising laws of the Federal Trade Commission? [j] If not, what is their policy on voluntary compliance. [k] Please discuss and explain any items you are not able to confirm.

DBP/USPS-47 [a] What percentage of postal facilities that have post office boxes provide access to their box section 24 hours a day? [b] Confirm, or explain if you are unable to do so, that these facilities fall into both those that have an employee on duty at the facility and those that do not. [c] What percentage of the total number of post office boxes are accessible 24 hours a day? [d] Confirm that, as a minimum, the box section in a post office should be accessible to the public at all times that a postal employee is on duty at the facility [which in many cases will be greater than the normal hours of retail operation]. If you are unable to confirm, please explain and discuss and provide specific information as to why it cannot be accomplished. [e] Provide information on the reasons which would allow a postal facility to permit access to the post office box section during times when there are no postal employees on duty in the facility. [f] Please provide copies of any directives or instructions that have been issued, if any, regarding the guidelines for determining whether a box section can be open when no postal employee is on duty.

DBP/USPS-48 With respect to Post Office Box service, [a] Is a postal facility required to post a sign in the box section indicating the time that all mail will be in the boxes? If not, why not? [b] What percentage of the days would you consider to be reasonable for the mail not to be in the boxes by the posted time. [c] Please discuss your belief why your response to subpart b is reasonable.

DBP/USPS-49 [a] Please confirm, or discuss and explain if you are unable to, that there are a number of post offices where there are two or more separate facilities having post office box service while being under the jurisdiction of the same Postmaster. For each of the

following situations of multiple box sections under the same Postmaster, advise whether the fee determination was performed for all of the separate facilities as a group or for each facility separately [b] Main post office and a branch with the same ZIP Code [c] Main post office and a station with the same ZIP Code [d] Main post office and an annex facility in the same area and with the same ZIP Code [e] Main post office and a CPU with the same ZIP Code [f] Same as subpart b except with different ZIP Codes [g] Same as subpart c except with different ZIP Codes [h] Same as subpart d except with different ZIP Codes [i] Same as subpart e except with different ZIP Codes [j] In those instances where two or more separate facilities had a single rate established for them, please explain the procedure that was utilized. [k] Confirm, or explain if you are unable to do so, that there are facilities where post office boxes have a separate ZIP Code from the street addresses. [l] How will this condition affect the determination of box rents?

DBP/USPS-50 [a] How is the geographic delivery ZIP Code boundary of a non-city delivery post office determined? [b] How is the geographic delivery ZIP Code boundary of a non-delivery post office determined? [c] Define and explain the term, "carrier delivery via an out-of-bounds delivery receptacle" as it appears in DMM Section D910.5.1a/b. [d] If I live in the same building as a non-delivery post office is situated, what box rent group do I pay? [e] Same as subpart d except a different post office has a rural or HCR route that passes the building. [f] Confirm, or discuss and explain if you are not able to confirm, that I may place a rural/HCR box anywhere in the country [assuming that I receive the permission of the property owner] and therefore obtain mail delivery from the rural/HCR carrier when they pass by the box? [g] If you confirm subpart f, explain who would be eligible to receive a Group E box? [h] What are the rules for extending a city delivery, rural, or HCR route to cover additional delivery points?

DBP/USPS-51 [a] Please provide a listing of the Erent / space values and Current and Proposed Group Classifications that will be utilized for determining the rates for Post Office Box service at all postal facilities. [b] Please provide a separate listing of those Erent / space values that have changed since the original list was prepared in the previous Docket.

DBP/USPS-52 [a] Explain why the cost factor was chosen to divide box rents into groups rather than some other method such as availability to the box or number of days of delivery to the box. [b] What options were considered and what were the reasons for their dismissal?

DBP/USPS-53 [a] Confirm, or discuss and explain if you are not able to confirm, that the Postal Service makes a business decision to not process a service in accordance with its own rules and advertisements to the public when there is a belief that it would cost more money to comply with the regulations than the penalty for not doing so. Some specific examples for which a specific individual response are: [b] Express Mail which will be impossible to achieve delivery by the guaranteed time will be accepted and the price of making the refund, if requested, is less than it would be to either fix the problem or increase the level of transportation/service. [c] Registered Mail which is handled as ordinary First-Class Mail as noted in the recent Inspection Service Area Coordination Audit Report on Special Services and the cost of paying a claim will be less than the cost to provide the proper handling of the mail. [d] Return Receipts which are completed by the addressee at a time after delivery without supervision of the Postal Service as mandated because it is easier for the Postal Service to complete them that way and save costs on the assumption that that the mailer will be unaware of the level of service, or non-service, that has been received [e] Insured Mail receives no special protection or handling enroute other than to have the addressee sign for it on the assumption that it is less expensive to pay the claims than to provide the service. [f] Normal collection times are not made as mandated in the POM because it is felt that it would cost too many hours to make the collections that are mandated in the POM and the belief that the mailing public will receive a satisfactory level of service even though it does not meet the requirements. [g] Same as subpart f except because it is felt that it would impact the arrival mail profile at the P&DC and would either require a capital expenditure for more equipment or a greater number of work hours than desired to process the mail for committed delivery standards. [h] Regularly scheduled collection times and retail window service hours are reduced or eliminated in the days on or surrounding holidays because it is believed that it will be possible to save hours while not inconveniencing the public. [i] If a collection box has a posted time on it, can the post office not make the collection by releasing a press story of the reduction to the news media - please limit your response to non-emergency conditions? [j] For each of the subparts above, explain whether the public would perceive the Postal Service's regulations, advertising, and/or claims to be valid, truthful, and/or meaningful with respect to the actual service being rendered as opposed to the service mandated, advertised, or claimed. [k] What action should a customer take when they observe or experience one of the conditions described above, or for that matter, have any concern or complaint regarding the operation of the United States Postal Service. [l] What action should a customer take when

they are unable to receive a comprehensive response within 14 days as mandated by Section 165.1 of the POM? [m] If a customer initially contacts a local Postmaster to resolve a complaint or concern and does not receive a comprehensive response as noted above, please provide a complete listing of the job titles, as well as the order to be followed, which the customer should then contact, for example, District Manager, Area Vice President, etc.

DBP/USPS-54 [a] Confirm, or explain and discuss if you are not able to confirm, that the EXFC program has accomplished the following three results, [1] It has allowed the Postal Service to find the root causes for many of the items which delay the mail and correct them so as to improve the service. [2] It has caused the Postal Service to engage in a high cost system for error correction. For example, before EXFC was in place, a post office receiving a quantity of mail for another office in error, just sent the mail back to the P&DC for delivery on the following day. Now the mail will be specially brought over to the other office so that it can be delivered on the scheduled day. and [3] It has caused post offices to come up with creative methods of manipulating the EXFC score such as a post office making collections before 5 PM at box locations that are mandated to be collected at 5 PM or later so as to achieve a better mail arrival profile at the P&DC and therefore improve the likelihood of a higher EXFC score. [b] Provide and explain any other benefits of the EXFC program.

DBP/USPS-55 [a] Please confirm, or discuss and explain if you are not able to confirm, that compensation for many Postal Service Installation Heads is affected by the EXFC results for their area of responsibility. [b] Other than the Installation Head [Postmaster / District Manager / etc.] provide a listing of the categories of Postal Service Managers whose compensation is affected by EXFC results. [c] Provide an explanation of the method by which the compensation is tied to the EXFC results. [d] Are all EXFC results utilized or is it limited to the overnight score only? [e] If only overnight, please explain why.

DBP/USPS-56 [a] Confirm, or explain and discuss if you are not able to confirm, that EXFC is a measurement for First-Class Mail only. [b] Confirm, or explain and discuss if you are not able to confirm, that all EXFC test mail is prepaid at the single piece rate and is deposited in collection boxes. [c] Confirm, or explain and discuss if you are not able to confirm, that EXFC pieces are not sent by any of the presorted / automation rates. [d] Provide the results of any studies that have been made showing the extent to which the delivery times of presorted / automation rate First-Class Mail is achieved. [e] Provide the results of any

studies that have been made which would allow the EXFC results to serve as a proxy for the automated / presorted mail. [f] Does the EXFC program check all types of First-Class Mail / by shape such as letter, flat, SPR etc., / by method of addressing such as printed, typewritten, or hand written / by method of postage prepayment such as stamped or metered? [g] What percentage of the country's total mail volume [of EXFC type of mail] is tested by the EXFC program? [h] Does the EXFC program make an effort to sample the origin-destination pairs, shape, method of addressing, and method of postage prepayment in proportion to the volume that exists within the entire universe? If not, why not. If so, provide copies of any study. If necessary, separate and discuss each separate criteria. [i] In the event that a post office wishes to eliminate collection from a collection box on a particular date and time, such as might occur on a holiday or a day surrounding a holiday, are they able to notify PriceWaterhouse in advance so that they will not deposit EXFC mail for that omitted collection time [even though the box is posted with that time]? [j] If the response to subpart i is yes, please provide a listing of all instances in which this was done in the past year.

DBP/USPS-57 [a] Confirm that both post cards and stamped cards may be mailed at the same 21-cent postage rate [proposed to be 23-cents]. [b] What is the average cost for acceptance, processing, and delivering a post card? [c] What is the average cost for acceptance, processing, and delivering a stamped card? [d] If separate data is not available, please explain why it is not collected. [e] Provide the existing and proposed cost coverage for the entire First-Class Mail card subclass and for the single-piece First-Class Mail card rates. [f] Confirm that, in general, the cost for handling post cards would be higher than for handling stamped cards. [g] Confirm that the following characteristics would tend to indicate that stamped cards would have a lower cost than post cards: they are more uniform in size, they are more likely to be have a printed address, they normally utilize the entire front of the card for the address. [h] Confirm that the following characteristics would tend to indicate that post cards would have a higher cost than stamped cards: they vary in size [between the authorized limits], they tend to have a glossy surface - both on the front and particularly on the reverse side, they are more likely to be hand addressed, and the left side of the card is normally utilized for a message rather than an address. [i] Explain and discuss any subparts that you are not able to confirm.

DBP/USPS-58 [a] What is the definition of the term, "philatelic products"? [b] What categories of products are included? [c] Confirm, or explain and discuss if you are not able to

confirm, that a number of philatelic products contain postage stamps which may be utilized like any other postage stamp to mail letters or contain stamped cards that may be utilized to send messages similar to any other stamped card. [d] How are the prices for philatelic products determined?

DBP/USPS-59 Most of the rates charged by the Postal Service are weight related. In order to mail the article it may be necessary to affix various labels or other material to the article as well as affix stamps to cover the cost. Please advise whether the following items are included in the weight of the article in determining the proper postage [for example, a Return Receipt card weighs approximately 0.12 ounces]. [a] If I affix one to a 0.95 ounce letter do I pay the one ounce rate because of the original weight of the letter of 0.95 ounces or am I required to now pay the two ounce rate because of the new total weight of 1.07 ounces? [b] The postage stamp or stamps that are affixed to pay the postage. [c] A Certified Mail sticker. [d] A Delivery Confirmation sticker [e] An Insured Mail sticker [f] A Registered Mail sticker [g] An Express Mail address label [h] A C.O.D. Mail label [i] If your response to subparts c, d, e, g, and/or h is yes, am I permitted to remove the mailing receipt part prior to the weight being determined?

DBP/USPS-60 [a] Within the past five years [up to and including R2001-1], has the Postal Service ever claimed in a pleading before the Postal Rate Commission that an improvement in post office box service would result from a granted post office box rate increase? [b] If so, provide details on the number of facilities that have had their service improved over the past five years, the types of improvements that have been made, the total cost of providing all of those improvements, and the total additional revenue that has been received over the past five years as a result of the rate increases as compared to not having raised the box rents at all.

DBP/USPS-61 The following Interrogatory was asked in Docket R2000-1 as Interrogatories DBP/USPS-131 through 134. Please respond to each of these Interrogatories with respect to the current policies that existed during the 2001 tax filing season.

Subpart a - DBP/USPS-131

Attached to this pleading is a letter dated September 24, 1999, as Attachment A. [a] Please verify that this letter was prepared and sent to me by an employee of the United States Postal

Service. [b] Please confirm, or explain and discuss if you are not able to confirm, that the procedures utilized by the Atlanta Post Office to process the completion of the Return Receipts on accountable mail destined to the Internal Revenue Service and the Georgia Income Tax Division is similar to the problems that were observed by the Inspection Service at the Andover, Massachusetts Internal Revenue Service as noted in the Inspection Service Area Coordination Audit Report on Special Services [USPS-LR-I-200]. [c] Please confirm, or explain and discuss if you are not able to confirm, that the procedures utilized by the Atlanta Post Office to process the completion of the Return Receipts on accountable mail destined to the Internal Revenue Service and the Georgia Income Tax Division do not meet the requirements of the Domestic Mail Manual [Section D042.1.7], Postal Operations Manual [Section 822.11], and Headquarters Directives. [d] Please confirm, or explain if you are not able to do so, that customers who purchased the referenced Return Receipt service did not receive the service that they paid for.

Subpart b - DBP/USPS-132

Attached to this pleading is a letter dated September 24, 1999, as Attachment B. [a] Please verify that this letter was prepared and sent to me by an employee of the United States Postal Service. [b] Please confirm, or explain and discuss if you are not able to confirm, that the procedures utilized by the Memphis Post Office to process the completion of the Return Receipts on accountable mail destined to the Internal Revenue Service is similar to the problems that were observed by the Inspection Service at the Andover, Massachusetts Internal Revenue Service as noted in the Inspection Service Area Coordination Audit Report on Special Services [USPS-LR-I-200]. [c] Please confirm, or explain and discuss if you are not able to confirm, that the procedures utilized by the Memphis Post Office to process the completion of the Return Receipts on accountable mail destined to the Internal Revenue Service do not meet the requirements of the Domestic Mail Manual [Section D042.1.7], Postal Operations Manual [Section 822.11], and Headquarters Directives. [d] Please confirm, or explain if you are not able to do so, that customers who purchased the referenced Return Receipt service did not receive the service that they paid for.

Subpart c - DBP/USPS-133

Attached to this pleading is a letter dated October 26, 1999, as Attachment C. [a] Please verify that this letter was prepared and sent to me by an employee of the United States Postal Service. [b] Please confirm, or explain and discuss if you are not able to confirm, that the

procedures utilized by the Philadelphia Post Office to process the completion of the Return Receipts on accountable mail destined to the Internal Revenue Service is similar to the problems that were observed by the Inspection Service at the Andover, Massachusetts Internal Revenue Service as noted in the Inspection Service Area Coordination Audit Report on Special Services [USPS-LR-I-200]. [c] Please confirm, or explain and discuss if you are not able to confirm, that the procedures utilized by the Philadelphia Post Office to process the completion of the Return Receipts on accountable mail destined to the Internal Revenue Service do not meet the requirements of the Domestic Mail Manual [Section D042.1.7], Postal Operations Manual [Section 822.11], and Headquarters Directives. [d] Please confirm, or explain if you are not able to do so, that customers who purchased the referenced Return Receipt service did not receive the service that they paid for.

Subpart d - DBP/USPS-134

Attached to this pleading is a letter dated September 28, 1999, as Attachment D. [a] Please verify that this letter was prepared and sent to me by an employee of the United States Postal Service. [b] Please confirm, or explain and discuss if you are not able to confirm, that the procedures utilized by the Cincinnati Post Office to process the completion of the Return Receipts on accountable mail destined to the Internal Revenue Service is similar to the problems that were observed by the Inspection Service at the Andover, Massachusetts Internal Revenue Service as noted in the Inspection Service Area Coordination Audit Report on Special Services [USPS-LR-I-200]. [c] Please confirm, or explain and discuss if you are not able to confirm, that the procedures utilized by the Cincinnati Post Office to process the completion of the Return Receipts on accountable mail destined to the Internal Revenue Service do not meet the requirements of the Domestic Mail Manual [Section D042.1.7], Postal Operations Manual [Section 822.11], and Headquarters Directives. [d] Please confirm, or explain if you are not able to do so, that customers who purchased the referenced Return Receipt service did not receive the service that they paid

DBP/USPS-62 [a] Please elaborate on the types of exceptional transportation that might be instituted to achieve timely delivery of Express Mail. [b] Please provide copies of any written material which provides guidance for providing exceptional transportation. [c] Please provide details of the approximate number of times that each of the types of exceptional transportation was utilized in a recent period of time of one year or more and the approximate percentage of articles requiring such exceptional transportation to achieve delivery by the

guaranteed time actually did receive it. [d] Please advise whether each of the following forms of achieving delivery by the guaranteed time would be considered to be the referred to exceptional transportation: [1] A city delivery carrier going several blocks out of the way to achieve timely delivery such as might be necessary to achieve delivery by the guaranteed 12 noon at an address that normally did not receive delivery until perhaps 2 PM. [2] Same as #1, except a rural or HCR carrier going many miles out of the way to achieve the same timely delivery. [3] Providing delivery to a city delivery address on a non-delivery day such as a Sunday, Holiday, or other non-delivery date. [4] Providing delivery to a rural or HCR address which utilizes an address in the format of 123 Main Street on a non-delivery day such as a Sunday, Holiday, or other non-delivery date. [5] Providing delivery to a rural or HCR address which utilizes an address in the format of RD 2 Box 123 on a non-delivery day such as a Sunday, Holiday, or other non-delivery date. [6] Transportation of the mail to a postal facility on a day when mail is not normally transported to the facility. This includes all 365 days of the year. [7] Establish a means for delivering the article once the transportation referred to in #6 has been accomplished. [8] Opening a postal facility to allow for delivery of mail addressed to a Post Office Box on any of the 365 days of the year. [9] Same as #8 for mail addressed to General Delivery. [e] Please provide any other examples besides the nine items referred to in subpart d above. [f] To what extent will cost of providing this exceptional transportation enter into the decision to utilize the exceptional transportation to achieve delivery by the guaranteed delivery time? [g] Please provide copies of any directives which relate to the decision in subpart f above. [h] Confirm that there are places in Alaska having postal facilities where access may be achieved by air only. [i] Confirm that at locations noted in subpart h above some to all receive mail transportation less than seven days a week [j] Confirm that at locations noted in subpart h above some to all do not have scheduled air transportation seven days a week. [k] Confirm that at locations noted in subpart h would require a special unscheduled trip to achieve access all 365 days a year. [l] Provide some indication of the cost of making an unscheduled trip to a remote location in Alaska. [m] Provide an indication of the number of postal facilities in Alaska that have scheduled mail transportation to them seven days a week, six days a week, five days a week, four days a week, three days a week, two days a week, one day a week, and less than one day a week. [n] Provide an indication of the number of communities in Alaska having postal facilities that have scheduled air service to them seven days a week, six days a week, five days a week, four days a week, three days a week, two days a week, one day a week, and less than one day a week. [o] Provide an indication of the number of communities in Alaska to which unscheduled air service is available

to them seven days a week, six days a week, five days a week, four days a week, three days a week, two days a week, one day a week, and less than one day a week. [p] Please explain the method by which the mail would be handled on either a scheduled or unscheduled air trip in Alaska [that was not a scheduled mail trip] with respect to the custody of the mail and the transfer of it to the Postal Service at the delivery point. [q] Are there existing agreements with air carriers to provide transportation of the mail on either a scheduled air trip [but not a normal mail trip] or on an unscheduled trip to an Alaska delivery point. [r] Please provide copies of such agreements. [s] What percentage of the Alaska points that are accessible by air only have such an agreement? [t] Confirm that there are places in Alaska having postal facilities where access may be achieved by water only or in addition to air. [u] Please provide the data requested in subparts i through s for those facilities noted in subpart t above. [v] Please provide an indication of the extent to which weather and/or other factors in Alaska will prevent scheduled mail trips from taking place as planned.

DBP/USPS-63 Please confirm that customers receiving an indication of a guaranteed delivery time for Express Mail could, in some to all instances, have an expectation that delivery would be accomplished by that time regardless of how isolated the destination might be.

DBP/USPS-64 Please refer to the response to POIR4/14 for the definition of a P&DC. Please clarify the conditions as to which a P&DC will dispatch mail to other P&DCs as opposed to ADCs.

DBP/USPS-65 Please refer to the response to OCA/USPS-27. [a] Please confirm, or explain if you are unable to do so, that with the exception of the 20 facilities that have been listed in the response, all of the remaining facilities in the United States to which Express Mail may be sent [as noted in response to DBP/USPS-11] will receive Express Mail shipments 365/6 days a year. [b] Will the shipment arrive at the facility in time to allow for delivery at all authorized addresses within the delivery area of that facility by the 12 noon or 3 PM scheduled delivery time? If not, provide a listing of any exceptions. [c] Does transportation exist which will allow all of these facilities to receive the mail in time for delivery not later than the second day after mailing at any facility in the United States from which Express Mail may be sent [as noted in response to DBP/USPS-10]. In not, provide a listing of any exceptions. [d] With respect to the listing of 20 facilities, please advise the days of the week and the time of the day

that each of the facilities sends and receives shipments of Express Mail. Are shipments made on some or all of the legal holidays [provide details if needed to fully explain].

DBP/USPS-66 [a] Please provide the definition of a parcel, including dimensions as appropriate, to allow for the use of Delivery or Signature Confirmation services for First-Class Mail and Package Services. [b] Confirm, or explain if you are unable to do so, that Delivery or Signature Confirmation services may be used with Priority Mail regardless of the shape of the article. [c] What are the reasons for the shape distinction between the availability of these services between Priority Mail and the other two services?

DBP/USPS-67 Please refer to the response to OCA/USPS-25 subpart d. [a] Please confirm, or explain if you are unable to do so, that the term weekend is normally taken to mean both Saturday and Sunday. [b] Please provide a listing of all facilities that Post Office Boxes will not be accessible on Saturday. [c] What percentage of all facilities with Post Office Boxes will not be accessible on Saturday? [d] Please provide a listing of all facilities that Post Office Boxes will not be accessible on Sunday. [e] What percentage of all facilities with Post Office Boxes will not be accessible on Sunday? [f] Please provide a listing of all facilities that Post Office Boxes will not be accessible on Holidays. [g] What percentage of all facilities with Post Office Boxes will not be accessible on Holidays? [h] Please confirm, or explain if you are unable to do so, that the term Express Mail street delivery refers to deliveries that are normally made by city delivery, rural delivery or HCR delivery carriers. [i] Please provide a listing of all facilities that normally provide street delivery on weekdays that do not provide Express Mail street delivery on Saturday. [j] What percentage of all facilities that normally provide street delivery on weekdays do not provide Express Mail street delivery on Saturday? [k] Please provide a listing of all facilities that normally provide street delivery on weekdays that do not provide Express Mail street delivery on Sunday. [l] What percentage of all facilities that normally provide street delivery on weekdays do not provide Express Mail street delivery on Sunday? [m] Please provide a listing of all facilities that normally provide street delivery on weekdays that do not provide Express Mail street delivery on Holidays. [n] What percentage of all facilities that normally provide street delivery on weekdays do not provide Express Mail street delivery on Holidays? [o] Please confirm, or explain if you are unable to do so, that the acceptance clerk at the originating facility will not be aware of whether or not it will be possible to obtain weekend or holiday delivery. [p] Please confirm, or explain if you are unable to do

so, that the mailer may not be aware of whether or not it will be possible to obtain weekend or holiday delivery.

DBP/USPS-68 [a] With respect to the Automation and Presorted Rates for Standard Mail, please confirm, or explain if you are unable to do so, that there are three separate rates depending on whether I mail them at a post office, or at a destination BMC, or a destination SCF. [b] Using the proposed nonprofit presorted rates for letters weighing 3.3 ounces or less, please confirm, or explain if you are unable to do so, that if I have 1000 pieces of mail all going to Englewood, NJ 07631 and I bring them into the Englewood Post Office, I will pay \$153. If I bring them all to the local BMC, I will pay \$132 and if I bring them all to the SCF at Hackensack NJ, I will pay \$127. [c] Please explain why I can save \$21 if I bring the mail to the BMC and \$26 if I bring the mail to Hackensack only to have the Postal Service transport all of the mail back to Englewood for delivery. [d] Why doesn't a lower rate exist for mail deposited at the destination office?

DBP/USPS-69 Please refer to the response to Interrogatory OCA/USPS-117 subpart d. Please confirm, or explain if you are unable to do so, that if delivery is made to a post office box at a time that the box is not accessible to the boxholder, then that will not qualify as a timely delivery.

DBP/USPS-70 Please refer to your response to Interrogatory OCA/USPS-118. Has Delivery Confirmation service always been available for mail addressed to the IRS since the time that service was established? If not, please provide details.

DBP/USPS-71 With respect to the proposed changes to the DMCS that the Postal Service is proposing with respect to obtaining refunds in the event of Express Mail not being delivered by the guaranteed delivery time, [a] Please provide the wording that will be utilized on the revised Mailing Label. [b] Please provide the wording that will be utilized in the changes to the Domestic Mail Manual. [c] Because a LITERAL reading of the overly broad wording of the exclusions for not having to pay refunds could be utilized if the proposed DMCS change is approved, what assurances will mailers have that refunds will still continue to be paid on a reasonable basis? [d] Approximately what percentage of the Express Mail refunds that were actually paid in a recent period of at least one year and prior to September 11, 2001 does the Postal Service believe would not have been paid had the new DMCS wording been in

effect for that time period? [e] Please provide details of the types of failures that would be covered in the response to subpart d including the number of refunds paid and their dollar amount.

DBP/USPS-72 Please refer to your response to Interrogatory DFC/USPS-11. Please provide any information [in any category - separate or otherwise] that the Postal Service may have which indicates the level of service and/or compliance with the requirements for the Return Receipt service which has been developed at the Area level or above in the past eleven years.

DBP/USPS-73 Please confirm, or explain if you are unable to do so, that: [a] Priority Mail which is handled by Fedex will be transported through their hub in Memphis [disregard mail destined for the Memphis area which obviously will not be transported out of the hub]. [b] It is possible for mail which is destined to one point on the west coast from another nearby point on the west coast to travel the distance equivalent of the distance across the country because it travels into and out of the hub in Memphis. [c] The total distance that an article travels in going from A to B through the hub in Memphis will have very little relationship to the actual distance from A to B, namely, it will vary from being relatively equal to the distance from point A to B to being equal to approximately twice the distance between them.

DBP/USPS-74 [a] Please confirm, or explain if you are unable to do so, that Express Mail rates used to be zoned rates based on the distance between the origin and destination. [b] Please confirm, or explain if you are unable to do so, that the present Express Mail rates are unzoned and are the same regardless of the distance between the origin and destination. [c] Please provide all of the reasons why the rate system was changed and level of significance for each of the reasons provided.

DBP/USPS-75 Please advise the status of the suspension of the sale of stamped envelopes including the reasons for the suspension, the potential changes being made in the envelopes and the costs associated with that, and the estimated time for resumption of sales of stamped envelopes.

DBP/USPS-76 [a] Please furnish a copy of the letter that was sent out in March 2001 to in-plant support area managers as a reminder of the proper procedures for handling special

services [see page 99 of USPS-T-36]. [b] Please furnish copies of any other letters or directives regarding the proper procedures for handing Certified Mail and/or Return Receipts since the initial Commission concerns in Docket R90-1.

DBP/USPS-77 [a] On page 12 of USPS-T-26 it indicates the new enhancement for users of certified or registered mail to receive delivery information through either the Internet or the CCM system. Will this service also be available to users of Insured Mail over \$50 or COD service? [b] If not, why not?

DBP/USPS-78 With respect to the utilization of the electronic return receipt service where the customer provides his or her e-mail address to the Postal Service, [a] to whom is this e-mail address made available? [b] Is there a separate form for this service? [c] If so, provide a copy of the front and back of the form. If not, explain. [d] Does the customer provide the e-mail address in writing or verbally to the Postal Service? [e] Describe the process by which this service will be provided starting at the time the article is presented for mailing and ending at the time the e-mail message is sent to the sender. [f] Must the article be presented at a service window or rural carrier to mail or may it be deposited in a collection box? [g] What security will be provided for the e-mail address? [h] Will the addressee obtain knowledge of the sender's e-mail address when the article is delivered? [i] Who will have access to the e-mail address? [j] What is the retention period of the e-mail address records? [k] Will the Postal Service monitor the sending of the e-mail to evaluate any undeliverable messages? [l] If not, why not? [m] If so, what action will be taken for undeliverable messages such as ensuring that the e-mail address was entered correctly? [n] Will a hard copy be mailed to the sender if the e-mail message is undeliverable? [o] If not, why not? [p] Confirm that the proposed fee for this service will be \$1.30.

DBP/USPS-79 [a] Confirm, or explain if you are unable to do so, that it is proposed to have two separate methods to obtain a Return Receipt after mailing. One method will be to go to a post office and complete a form and the other will be to utilize the Internet. [b] Confirm, or explain if you are unable to do so, that the proposed fee for both of these methods will be \$3.25. [c] Provide a complete and detailed listing of each of the steps that a mailer and postal employee will do in obtaining and/or rendering the service. [d] Please explain how the costs for each of these two separate methods was determined as well as resulting in the same fee.

DBP/USPS-80 With respect to the Erents that are utilized to determine the Group for the determination of the fees for Post Office Box service, please clarify the conversion of the Current Classifications as shown on page 5 of USPS T-38 to the Proposed Classifications shown on page 10. Some of the classifications shown in the Proposed listing do not appear to be possible under the Current listing. For example, Proposed Group 2 has former Group B2 with cost per sq. ft. <\$12.50 however, Current Group B2 only has costs that are \$12.50. Another example, Proposed Group 2 has former Group C4 with cost per sq. ft. \$10.00 however, Current Group C4 only has costs that are <\$10.00. Please clarify and explain all inconsistent conversions including the two examples provided.

DBP/USPS-81 [a] With respect to the proposed change to DMCS Section 232c adding the requirement for machinability in addition to size, provide the proposed DMM wording to implement this change. [b] Please explain why a 6 by 9 inch one-ounce letter with a metal clasp would require the non-machinability surcharge? [c] Please explain why a single key taped to a card so as not to be loose would require the surcharge while one or more coins taped to a card would not. [d] How rigid is rigid in the "rigid or odd-shaped" definition? Does a paper product such as a piece of cardboard fall into this category? [e] Does a single coin taped to a card "bend easily when subjected to a transport belt tension of 40 lbs. around an 11-inch diameter turn"? Would multiple coins bend easily? Would the diameter of the coin affect the ability to bend easily? How does a mailer make this determination? [f] Please confirm, or explain if you are unable to do so, that equipment COULD damage any piece of mail. [g] How does a mailer determine the point where the mailpiece is now "too flimsy" so as to require the surcharge? [h] Would a single sheet of 20-lb paper folded in thirds require the surcharge? [i] Does the address have to be parallel to the longest dimension in order to avoid paying the surcharge? [j] Confirm, or explain if you are unable to do so, that in a rectangular mailpiece if the address is parallel to the shortest dimension it will be perpendicular or 90 degrees to the longest dimension. [k] For all angles between 1 degree and 89 degrees that the address forms with a line that is parallel to the longest dimension will the surcharge apply? [l] If a folded mailer has the folded edge both parallel and perpendicular to the longest dimension [such as might be obtained by folding an 8.5 by 14 sheet of paper into quarters], will the surcharge apply? [m] If the folded self-mailer is completely sealed on all sides, will the surcharge apply? [n] If the booklet-type piece is completely sealed on all sides, will the surcharge apply? [o] Describe the characteristics that distinguish between a "folded self-mailer" and a "booklet-type piece". [p] Quantify the level of gloss on a postcard that would

require an LMLM label? How does a mailer determine this level? [q] With respect to each of the stamped cards that the Postal Service has sold over the years of the type similar to the Santa cards and Baseball Fields cards that were issued this year, is the level of gloss on these cards such that it could require an LMLM label and thereby be subject to the surcharge? [r] If the postcard has a level of gloss as to require an LMLM label, does the surcharge apply only when the label covers the address and/or message? [s] If an LMLM label is applied which covers the address and/or message, does the surcharge apply regardless of level of gloss? [t] Does the picture on a postcard qualify as part of the message? [u] Does the restriction on not covering part of the message, reduce the value of the postcard by reducing the area which may be utilized for the message? [v] Does the surcharge apply if an LMLM label is utilized on other than a postcard? [w] If an LMLM label is utilized for any reason other than gloss on a postcard, such as might occur because a mailpiece has received an incorrect barcode or the mailpiece is being forwarded or returned, does it now require payment of a surcharge? [x] Does the legibility, neatness, size, and other characteristics of the addressing have any effect on the application of a surcharge? If so, please fully explain. [y] If a mailpiece is rejected from automation and ends up in the manual operation for any of the reasons specified on lines 17 to 21 of page 10 of USPS-T-39, will it then require a surcharge? If so for any of the conditions mentioned, please explain fully.

DBP/USPS-82 The November 2001 issue of *Mailers.Companion* issued by the Postal Service states on the headline on the front cover, "Rates and Fees Will Not Increase Before September 2002". [a] Is this still the current belief of the Postal Service? [b] If not and an earlier implementation date is utilized, what reaction do you believe the readers of that publication will have? [c] Please describe the audience of *Mailers.Companion*.

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 B. Popkin November 26, 2001
