

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

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES  
POSTAL SERVICE [DBP/USPS-104-120]

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. The instructions contained in the interrogatories DBP/USPS-1-82, dated November 26, 2001, are incorporated herein by reference.

December 18, 2001            Respectfully submitted,

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

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DBP/USPS-104     Please refer to your response to OCA/USPS-237 subpart a. [a] Please provide details of those instances that have been corrected and the method utilized to provide the service at those location[s]. [b] Please provide an estimate of the percentage of high volume recipients that now have their return receipts processed in accordance with the provisions of the DMM. [c] Please advise the details of any programs that will be utilized to improve the percentage of return receipts that are processed in accordance with the provisions of the DMM. [d] Please advise when the Postal Service expects to have the problem fully corrected and all return receipts that are processed in accordance with the provisions of the DMM.

DBP/USPS-105     Please refer to your response to OCA/USPS 237 subparts b and c. [a] Please advise the one location that set up an operation to automate the completion of the PS Form 3811. [b] Please provide details of the automated system utilized and provide a copy of a sample completed return receipt form. [c] Please provide a listing of those high volume users that hand over certified mail before obtaining signatures on the return receipts. [d] Provide the name of the location that stopped the practice and provide details of the system that is utilized at that location including a copy of a sample completed return receipt form. [e] Please provide details of the "approach of automated printing of receipt information on

receipts" that is being considered. [f] Provide the date the USPS anticipates when each problem will be resolved.

DBP/USPS-106 Please refer to your response to OCA/USPS 238 subpart g. [a] Please provide a draft copy of the proposed communication and advise the method of dissemination. [b] Please provide copies of any other actions that have been taken over the past three years relating to the proper completion of return receipts.

DBP/USPS-107 Please refer to your response to DBP/USPS-61. Please provide specific details that are now being utilized by the Philadelphia post office for processing both the Certified Mail and the associated return receipts including sample copies of any forms that are being utilized and of a sample completed return receipt form.

DBP/USPS-108 Please refer to your response to DBP/USPS-61. [a] Please advise why the Atlanta, Memphis, and Cincinnati Post Offices continue to process return receipts in a manner that does not meet the requirements of the DMM/POM. [b] Please advise the steps being taken to bring these offices into compliance and the estimated date for such action.

DBP/USPS-109 Please refer to your response to DBP/USPS-76 subpart a. [a] Please confirm, or explain if you are not able to do so, that the March 2, 2001 letter does not relate to the processing of return receipts on mail sent to the IRS. [b] Please confirm, or explain if you are not able to do so, that the March 2, 2001 letter relates only to the processing of the mailpiece itself and special services such as, Delivery Confirmation, Signature Confirmation, Certified Mail, and Registered Mail. [c] Please advise why the processing of return receipts was not included in this letter. [d] Please provide complete details of the "delayed processing of tax returns" as related in line 1 of the letter. [e] Please provide complete details of the "negative publicity" as related in line 2 of the letter including copies of any newspaper and other articles that are available. [f] Please provide sample copies of PS Forms 3883 and 3833 as referred to in the letter.

DBP/USPS-110 Please refer to your response to DBP/USPS-76 subpart b. Please confirm, or explain if you are not able to do so, that the three Postal Bulletin pages provided relate to the proper use of labels that are privately printed by mailers for use on their outgoing

mail and provide no information on the delivery procedure of accountable mail or on any phase of return receipts.

DBP/USPS-111 Please refer to your response to DBP/USPS-79 subparts a and b. [a] Please explain at what point an Electronic Return Receipt service obtained over the Internet for \$1.30 gets converted into an Internet request for a Return Receipt after mailing for \$3.25. [b] How late after the mailing of the original mailpiece may a mailer request an Electronic Return Receipt service obtained over the Internet for \$1.30? [c] Please advise the type of information that will be provided by the Postal Service in each of these two services.

DBP/USPS-112 Please refer to your response to DBP/USPS-79 subpart c. [a] Please provide a draft of the proposed procedures. [b] If the procedures have not been determined yet, please provide the details of how you determined that the service will require a \$3.25 fee. [c] I am looking for a narrative, as opposed to the regulations, of the steps that a mailer and the postal employee will take in providing this service in each of the two methods so that a comparison may be made of the costs involved including those steps that require employee time and an indication of the time spent. Providing a manual return receipt after mailing seems to be far more labor intensive than the same service provided over the Internet and I would like the data to investigate this.

DBP/USPS-113 In your response to DBP/USPS-25 subparts a and b, you indicate that it is a goal to achieve the signing for all accountable mail and the associated return receipt at the time of delivery regardless of the type of addressee or the number of articles involved. [a] Elaborate what you mean by a goal. [b] Does this goal have the support of management? [c] Does this goal apply to all delivery offices? [d] Do you agree that this goal should be attempted to be met by all delivery offices? [e] Explain any negative response to subparts b through d. [f] Are there any instances existing anywhere within the Postal Service where the signing for the accountable mail and the associated return receipt are, by default or by design, not completed at the time of delivery? [g] Provide details of any affirmative response to subpart f including the authority for and the method of delivery. If a detached mail unit is a method of delivery, confirm, or explain if you are unable to do so, that a detached mail unit is an activity which is operated by Postal employees at the addressee's location. [h] Elaborate on your response to the statement in reply to subpart b, "In some cases it is possible that the signature takes place after delivery." [i] In your response to subpart e, you indicated that it

would be relatively rare for multiple pieces of articles requesting return receipts to be addressed to a single recipient. Does this apply to various government agencies, such as IRS and the state tax departments, as well as other government agencies and large commercial organizations? [j] Confirm, or explain if you are unable to do so, that DMM Section D042.1.7b would place the requirement for obtaining the signature at the time of delivery from that of being a goal to that of being a regulation. [k] Does DMM Section D042.1.7 apply to all addressees within the service area of the United States Postal Service? [l] If not, provide a listing of any exceptions and the authority for doing so.

DBP/USPS-114 Please refer to your response to DBP/USPS-12 subpart b. Please confirm, or explain if you are unable to do so, that the cutoff time will be established by the Postmaster based upon the Express Mail network that is available to his/her office.

DBP/USPS-115 Please refer to your response to DBP/USPS-12 subpart c. [a] Is it permissible for a Postmaster to establish a cutoff time on a given day which is either equal to or earlier than the opening of the window service on that day [so that mailers will in effect be unable to mail Express Mail that day to achieve the overnight service for the following day or second day service on the second day]. [b] Please provide a listing of any facility that does not provide at least one hour of window service prior to the cutoff time [show the name, state, ZIP Code, window opening time, Express Mail cutoff time, and day[s] of the week involved].

DBP/USPS-116 Please refer to your response to DBP/USPS-13 subpart b. The criteria have not been provided. Please provide.

DBP/USPS-117 Please refer to your response to DBP/USPS-13 subpart c. Please clarify your response. The interrogatory is attempting to confirm that if I can send Express Mail from Point A to Point B and have guaranteed delivery by 12 Noon the next day for articles being delivered on a weekday, the 12 Noon guarantee will also apply on Saturday, Sunday, and/or holiday deliveries.

DBP/USPS-118 Please refer to your response to DBP/USPS-12 subpart b. [a] Please advise the date when the Postal Service changed its policy regarding the ability to avoid an Express Mail failure on mail addressed to a post office box by placing a notice in the box, regardless of whether or not the customer has access to the box at that time. [b] Please

advise the reasons for making this change in policy. [c] Please advise how this change was communicated to the mailing public and provide copies of any printed material. [d] Please advise how this change was communicated to postal facilities and provide copies of any printed material. [e] Please advise the reasons why the Postal Service believes that it is providing a quality service by this procedure. [f] Must the notice be physically placed into the customer's post office box, or is it sufficient to claim timely delivery by the mere knowledge of the Postal Service that customer access is not available and the article has arrived in the area of delivery [such as the main office with the box at a postal station or at the P&DC with the knowledge that the boxes are closed at that associate office]? [g] Please clarify your response with General Delivery mail. Is timely delivery achieved [assuming a 12 Noon guarantee] if the article arrives at the facility at 11:30 AM and at the General Delivery window at 12:30 PM? [h] Please respond to subparts a through e of this interrogatory as they apply to delivery of mail addressed to General Delivery.

DBP/USPS-119 Please refer to your response to DBP/USPS-16 subpart d. [a] Please advise the significance of the A\* and P\* that appear on each entry under SVC. [b] Please confirm, or explain if you are not able to do so, that if a 3-digit ZIP Code appears on this list, PO-PO service will be available from all facilities anywhere in the country and addressed to all postal facilities that are within that 3-digit ZIP Code range for delivery by 10 AM overnight [for those offices that have overnight PO-Addressee service] and by 10 AM on the second day for all other offices - accounting for the delivery office being closed for weekend/holiday. [c] Please explain the rationale and criteria for choosing which 3-digit prefixes have been placed on this list since there are large cities on the list such as, Los Angeles and Baltimore while other large cities are not on the list such as New York and Chicago and there are small cities on the list such as Elizaville and Lagrangeville, New York. [d] Please explain the apparent inconsistencies that exist in the choice of these 3-digit prefixes, such as Arlington and Alexandria VA have service but the rest of Northern Virginia SCF 220 and 221 do not including the mail processing facility at Merrifield VA. Another example is where Greenville SC is both 293 and 296 and only 296 is on the list. [e] Please advise the total number of valid 3-digit ZIP Codes prefixes in the country that have delivery facilities to which PO-PO service may be sent. [f] What percentage of all valid 3-digit ZIP Code prefixes having delivery facilities does the PO-PO list represent? [g] Please advise all of the delivery facilities that are available for PO-PO service in the 733 prefix. [h] Based on the response to subpart f of this interrogatory, how can this service be considered to be a nationwide service?

DBP/USPS-120 Please refer to your response to DBP/USPS-16 subpart f. [a] Please confirm, or explain if you are unable to do so, that if I were to mail a PO-Addressee Express Mail article under the same conditions as noted on a Saturday and which is destined to an office that is not on the overnight list, it would be guaranteed for delivery on Monday. [b] Please confirm, or explain if you are unable to do so, that if I were to mail both a PO-PO and a PO-Addressee article on a Monday of a non-holiday week between the same two points, both would be guaranteed for delivery on Wednesday. [c] Since it is possible to have PO-Addressee mail sent on Saturday arrive in time for a timely Monday delivery and since if a weekend is not involved both will be delivered on the second calendar day, please explain the reasons for your response to the scenario presented in subpart f of the original interrogatory.

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#### 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 December 18, 2001

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