BEFORE THE

POSTAL RATE COMMISSION WASHINGTON DC 20268-0001

Postal Rate and Fee Changes, 2001]

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FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE [DBP/USPS-122-138]

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 26, 2001 Respectfully submitted,

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

DBP/USPS-122 Please refer to your response to DBP/USPS-51. [a] Please indicate the expected completion date of the new Erent values that are currently being prepared for use in making final assignments of ZIP Codes to fee groups. [b] When available please provide a revised copy of the two Library References J-204 and J-205 including a listing of those facilities that have changed their values or fee group. For those that have changed their Erent, provide a listing showing both the old value and the new value. For those that have changed their fee group, provide a listing showing both the old fee group and the new fee group. [c] Please advise the procedures that will be utilized to update Erent values in the future. [d] What procedures will be utilized to change fee groups when the Erent values change?

DBP/USPS-123 Please refer to your response to OCA/USPS-236 subpart a attachment page 1. [a] What does the acronym PC stand for? [b] Regarding the processing of return receipt cards noted in #3 of Solutions Implemented, were all return receipts signed [this also includes an automated signing system] prior to the time that the control of the mail was transferred from the Postal Service to the addressee or at a later, more convenient time? [c] If not signed prior to transfer of control, please provide all details and the method utilized. [d] If an automated signing system was utilized, please provide details including a sample copy of the Form 3811.

DBP/USPS-124 Please refer to your response to OCA/USPS-236 subpart a attachment page 2. [a] Regarding the processing of return receipt cards noted in the second paragraph, were all return receipts signed [this also includes an automated signing system] prior to the time that the control of the mail was transferred from the Postal Service to the addressee or at a later, more convenient time? [b] If not signed prior to transfer of control, please provide all details and the method utilized. [c] If an automated signing system was utilized, please provide details including a sample copy of the Form 3811.

DBP/USPS-125 Please refer to your response to OCA/USPS-236 subpart a attachment page 3. [a] Regarding the processing of return receipt cards noted in the second paragraph, once the corrective action was taken, were all return receipts signed [this also includes an automated signing system] prior to the time that the control of the mail was transferred from the Postal Service to the addressee or at a later, more convenient time? [b] If not signed prior to transfer of control, please provide all details and the method utilized. [c] If an automated signing system was utilized, please provide details including a sample copy of the Form 3811.

DBP/USPS-126 Please refer to your response to OCA/USPS-236 subpart a attachment page 4. [a] Regarding the processing of certified mail, were all return receipts signed [this also includes an automated signing system] prior to the time that the control of the mail was transferred from the Postal Service to the addressee or at a later, more convenient time? [b] If not signed prior to transfer of control, please provide all details and the method utilized. [c] If an automated signing system was utilized, please provide details including a sample copy of the Form 3811.

DBP/USPS-127 Please refer to your response to OCA/USPS-236 subpart a attachment page 5. [a] Regarding the processing of certified mail, were all return receipts signed [this also includes an automated signing system] prior to the time that the control of the mail was transferred from the Postal Service to the addressee or at a later, more convenient time? [b] If not signed prior to transfer of control, please provide all details and the method utilized. [c] If an automated signing system was utilized, please provide details including a sample copy of the Form 3811.

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DBP/USPS-128 Please refer to your response to OCA/USPS-236 subpart a attachment page 6. [a] Regarding the processing of certified mail, were all return receipts signed [this also includes an automated signing system] prior to the time that the control of the mail was transferred from the Postal Service to the addressee or at a later, more convenient time? [b] If not signed prior to transfer of control, please provide all details and the method utilized. [c] If an automated signing system was utilized, please provide details including a sample copy of the Form 3811.

DBP/USPS-129 Please refer to your response to OCA/USPS-236 subpart a attachment page 7. [a] Regarding the processing of certified mail, were all return receipts signed [this also includes an automated signing system] prior to the time that the control of the mail was transferred from the Postal Service to the addressee or at a later, more convenient time? [b] If not signed prior to transfer of control, please provide all details and the method utilized. [c] If an automated signing system was utilized, please provide details including a sample copy of the Form 3811.

DBP/USPS-130 Please refer to your response to OCA/USPS-236 subpart a attachment pages 8 and 9. [a] Regarding the processing of certified mail, were all return receipts signed [this also includes an automated signing system] prior to the time that the control of the mail was transferred from the Postal Service to the addressee or at a later, more convenient time? [b] If not signed prior to transfer of control, please provide all details and the method utilized. [c] If an automated signing system was utilized, please provide details including a sample copy of the Form 3811. [d] Regarding the use of canceling machines at the Sacramento P&DC to process 3811's, [1] Who is the employer of the individual[s] who remove the return receipt cards from the mail piece? [2] Where are the canceling machines physically located? [3] Who is the employer of the individual[s] operating the canceling machines? [4] Does an employee of the addressee observe the return receipt cards from the mail piece? [5] Does an employee of the addressee observe the operation of the canceling machine? [6] Does an employee of the addressee observe the operation of the canceling machine? [6] Does an employee of the addressee observe the operation of the canceling machine?

DBP/USPS-131 Please refer to your response to OCA/USPS-236 subpart a attachment page 10. [a] Regarding the processing of certified mail, were all return receipts signed [this also includes an automated signing system] prior to the time that the control of the mail was

transferred from the Postal Service to the addressee or at a later, more convenient time? [b] If not signed prior to transfer of control, please provide all details and the method utilized. [c] If an automated signing system was utilized, please provide details including a sample copy of the Form 3811.

DBP/USPS-132 Please refer to your response to OCA/USPS-236 subpart a attachment page 11. [a] Regarding the processing of certified mail, were all return receipts signed [this also includes an automated signing system] prior to the time that the control of the mail was transferred from the Postal Service to the addressee or at a later, more convenient time? [b] If not signed prior to transfer of control, please provide all details and the method utilized. [c] If an automated signing system was utilized, please provide details including a sample copy of the Form 3811.

DBP/USPS-133 Please refer to your response to OCA/USPS-236 subpart a attachment page 12 [a] Regarding the processing of certified mail, were all return receipts signed [this also includes an automated signing system] prior to the time that the control of the mail was transferred from the Postal Service to the addressee or at a later, more convenient time? [b] If not signed prior to transfer of control, please provide all details and the method utilized. [c] If an automated signing system was utilized, please provide details including a sample copy of the Form 3811.

DBP/USPS-134 Please refer to your response to OCA/USPS-236 subpart d attachment page 1. [a] Regarding the processing of certified mail, were all return receipts signed [this also includes an automated signing system] prior to the time that the control of the mail was transferred from the Postal Service to the addressee or at a later, more convenient time? [b] If not signed prior to transfer of control, please provide all details and the method utilized. [c] If an automated signing system was utilized, please provide details including a sample copy of the Form 3811.

DBP/USPS-135 Please refer to your response to OCA/USPS-236 subpart d attachment pages 2 and 3. [a] Regarding the processing of certified mail, were all return receipts signed [this also includes an automated signing system] prior to the time that the control of the mail was transferred from the Postal Service to the addressee or at a later, more convenient time? [b] If not signed prior to transfer of control, please provide all details and the method utilized. [c] If an automated signing system was utilized, please provide details including a sample copy of the Form 3811.

DBP/USPS-136 Please refer to your response to OCA/USPS-236 subpart d attachment page 10. [a] Please describe the procedures that are utilized to ensure that all Priority Mail with Delivery Confirmation addressed to an IRS or state tax return center will be properly scanned at delivery. [b] Please advise the specific point of activity [from the processing plant to the ultimate transfer of control to the addressee] at which the scanning of delivery will take place.

DBP/USPS-137 Please refer to your response to OCA/USPS-236 subpart d attachment page 13. [a] Please provide copies of the instructions that were utilized to obtain the data for the entries in this report. [b] What is the significance of "finding" a tray containing certs? [c] Please explain how it is possible to have more "Trays Containing Certs" than "Trays Sampled". [d] Is data available for other dates besides April 11, 2001?

DBP/USPS-138 Please refer to your response to OCA/USPS-236 subpart d attachment page 23. [a] Please provide any other instructions or guidelines that were prepared for use at Hartford other than the attachments of pages 21 to 27. [b] Please confirm, or explain and discuss if you are not able to do so, that my interpretation of the Certified Processing Flow is as follows: [1] All certified mail pieces will be directed to a number of USPS employees [5 in the chart provided] who will scan the article number on those pieces with a Certified Mail label containing a barcode. [2] One [or more] USPS employees will manually enter into the computer the Certified Mail number on those mail pieces that do not have a Certified Mail label with a barcode. [3] A manifest will be printed out which contains the article number of 500 pieces [the final printout of a series may contain less than 500 pieces]. [4] All of the certified mail pieces will then be transferred to a number of USPS employees [5 in the chart provided] who will remove the PS Form 3811's from the mail pieces. [5] Steps 1 through 4 will take place at the Postal Service facility. [6] The mail pieces will be delivered to the addressee. [7] A tray will be presented to the addressee containing the copies of the manifest and PS Form 3811's. [c] Please advise the number of copies of the Manifest that are prepared and the distribution of them after signing. [d] Does the manifest receive a manual signature of an employee or agent of the addressee? [e] Please advise the method that is utilized to "sign" the PS Form 3811's and if other than a manual signature, provide a sample copy. [f] Are the

PS Form 3811 forms signed at the time of completion of the manifest? If not, when are they? [g] Please advise any evaluation that is made to ensure the proper completion of the PS Form 3811. [h] Please advise the date, relative to the date of delivery of the mail piece, that the PS Form 3811 will be returned to the mail stream for dispatch.

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 26, 2001