

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DAVID B. POPKIN,
REDIRECTED FROM THE POSTAL SERVICE
(DBP/USPS-105, 113)

The United States Postal Service hereby provides the responses of witness Mayo to the following interrogatories of David B. Popkin: DBP/USPS-105 and 113, filed on December 18, 2001, and redirected from the Postal Service.

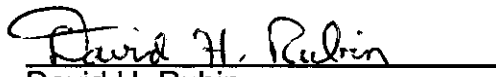
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


David H. Rubin

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January 7, 2002

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DAVID B. POPKIN
(DBP/USPS-104-113)

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.

RESPONSE:

[a] One location that uses an automated operation for completing the PS Form 3811 is Sacramento, California.

[b] Postal employees modified a Mark II facer canceller machine to stamp the name, date and toll-free number of a state representative on the PS Form 3811 Return Receipts. This expedited method of return receipt stamping/signing made it possible to complete return receipts while the certified mail was still in the possession of the postal employee handing the mail to the state tax agency. A copy of a sample completed return receipt form will be provided if it can be obtained.

[c] A listing of this nature has not been compiled.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DAVID B. POPKIN
(DBP/USPS-104-113)

DBP/USPS-105. (CONTINUED)

RESPONSE:

[d] Sacramento, California. The process is described in (b) above.

[e] See (b) above. The details of this approach are still under consideration.

[f] No specific date has been established.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DAVID B. POPKIN
(DBP/USPS-104-113)

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.

RESPONSE:

I assume you are referring to witness Plunkett's Docket No. R97-1 response to interrogatory DBP/USPS-32.

[a] A goal in this case refers to a general business objective.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
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(DBP/USPS-104-113)

DBP/USPS-113. (CONTINUED)

RESPONSE:

[b] It is not a formal corporate goal but rather a business objective. A goal is a measurable event with a specific time and level of achievement. A general business objective refers to a desired achievement for the organization.

[c] *The business objective applies to all delivery offices.*

[d] Yes.

[e] I assume that witness Plunkett was considering the entire variety of return receipt deliveries, including deliveries to large organizations.

[f-h] See the responses to OCA/USPS-236 and 237 and DBP/USPS-104 and 105.

[i] There is no part (e) in the response to DBP/USPS-25.

[j] The DMM contains regulations, not goals.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
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(DBP/USPS-104-113)

DBP/USPS-113. (CONTINUED)

RESPONSE:

[k] Yes.

[l] Not applicable.

DECLARATION

I, Susan W. Mayo, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Susan W Mayo

SUSAN W. MAYO

Dated: JANUARY 7, 2002

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


David H. Rubin
David H. Rubin

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January 7, 2002