

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001**

**Complaint on Sunday
and Holiday Collections**

Docket No. C2001-1

**DIRECT TESTIMONY
OF
DOUGLAS F. CARLSON
PART 2**

April 23, 2002

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1 **SCOPE OF TESTIMONY PART 2**

2 Part 1 of my testimony discussed historical trends in processing of outgoing
3 First-Class Mail on holidays, the nature of the Postal Service's notice to the public of
4 holiday collection and mail-processing services, customers' need for holiday
5 collection and mail processing, my own experiences with holiday mail services, and
6 a proposed solution to inconsistent holiday services and insufficient notice to the
7 public of holiday services.

8 Part 2 of my testimony discusses problems with collection services on the
9 eves of some holidays. Part 2 also discusses the extent to which holiday collection
10 times are posted on collection boxes that do not, in fact, provide customers with
11 outgoing mail processing on every holiday.

12 **VIII. POSTAL SERVICE COLLECTION PRACTICES ON EVES OF SOME HOLIDAYS**

13 On the eves of some holidays, in some parts of the country, the Postal
14 Service performs final collections from collection boxes prior to the time posted on
15 the collection boxes for the day of the week corresponding to the eve of the holiday.
16 For example, if Christmas Eve falls on a Friday, the Postal Service may perform the
17 final collection prior to the final weekday collection time posted on each collection
18 box. For simplicity, in this testimony I will use the term "early collections" to refer to
19 this practice. The level of notice that the Postal Service provides to the public to
20 advise the public of early collections on eves of holidays is insufficient.

21 **A. Actual Policy and Practice**

22 Under recent Postal Service practice, an office at headquarters issues a
23 memo to each Area prescribing operations policy for the upcoming holiday period.
24 Some field offices appear to pay attention to this memo, while others disregard it.
25 The memos for 1998, 1999, and 2000 appear in USPS-LR-C2001-1/1. I obtained
26 the memo for December 2001 via the Freedom of Information Act. This memo
27 appears in Appendix 1.

1 In response to discovery requests, the Postal Service provided evidence of
2 early collections on eves of holidays in 1998, 1999, and 2000. The Postal Service
3 also provided evidence revealing that the Postal Service, on Christmas Eve in 1996,
4 did not collect or process *any* outgoing mail for customers in Utah or for customers
5 in Arizona served by the Phoenix and Tucson processing and distribution centers
6 (most of the population of Arizona). On Christmas Eve in 1998, the Postal Service in
7 the Tucson area declined to provide customers with any outgoing First-Class Mail
8 service, a monopoly postal service that no other delivery company offers. On
9 Christmas Eve in 1999, the Postal Service provided no outgoing First-Class Mail
10 service in Utah, even though no outgoing mail service was available on the following
11 two days, either. The Postal Service provided no other evidence from 1996 and no
12 evidence of early collections in 1996. I am not confident that the information
13 provided for years prior to 1999 is complete.

14 In January 2002, I submitted *Freedom of Information Act (FOIA)* requests to
15 Postal Service Public Affairs and Communications offices to obtain copies of press
16 releases and related documents describing changes in collection schedules on
17 Christmas Eve and New Year's Eve in December 2001. I eventually received
18 information from all areas except the Southwest Area, which illegally ignored my
19 FOIA request. I also received documents, via FOIA, from the manager of Customer
20 Satisfaction Measurement, a headquarters office that compiles information on
21 changes in collection schedules around the country. The information from this office
22 augmented the information that the Public Affairs and Communications Offices
23 provided.

24 The spreadsheet in Appendix 2 compiles the changes to collection schedules
25 that appear in Postal Service responses to discovery requests and the public
26 documents that I obtained under FOIA. Totals appear at the bottom of the
27 spreadsheet.

1 In 1998, 15 districts performed early collections on Christmas Eve, and three
2 districts performed early collections on New Year's Eve. The headquarters policy
3 memo required normal collections on both days. USPS-LR-C2001-1/1.

4 In 1999, 22 districts performed early collections on Christmas Eve, and five
5 districts performed early collections on New Year's Eve. The headquarters policy
6 memo permitted curtailment of "late evening" mail collections on Christmas Eve and
7 no curtailment on New Year's Eve. USPS-LR-C2001-1/1. Presumably 5:00 PM
8 collections, and even 6:30 PM and 7:00 PM collections, would not constitute "late
9 evening" collections, so all curtailments — e.g., noon collections, use of Saturday
10 collection schedules — except those in the Northern Virginia District were
11 inconsistent with headquarters policy. The Northern Virginia District eliminated only
12 collections after 7:00 PM.

13 Only two districts performed early collections on Saturday, December 23,
14 2000, and Saturday, December 30, 2000, since the true eve of the holiday was on
15 Sunday, and the holiday was on Monday. The South Jersey District performed
16 normal *weekday* collections on Saturday, December 23, 2000, to accommodate
17 expected mail volume. The headquarters policy required normal collections on
18 December 23, 2000, and December 30, 2000. USPS-LR-C2001-1/1.

19 Headquarters policy authorized early collections on Monday, July 3, 2000.
20 USPS-LR-C2001-1/1. Only the New York District seized this opportunity.

21 In 2001, 14 districts performed early collections on Christmas Eve, and 11
22 districts performed early collections on New Year's Eve. The headquarters policy
23 memo required *normal* collections on Christmas Eve and New Year's Eve. USPS-
24 LR-C2001-1/1.

25 In 2001, the Postal Service's Appalachian District sank to a new low. In
26 addition to performing final collections at noon on Christmas Eve and New Year's
27 Eve, the Appalachian District performed final collections at noon on Saturday,
28 December 22 and Saturday, December 29. The early collections specifically

1 included lobby drops in post offices, so customers were completely denied outgoing
2 First-Class Mail service in the afternoon on these *four* days in the 250, 251, 252,
3 253, 263, 264, and 265 ZIP Code areas in West Virginia and the 240 and 241 ZIP
4 Code areas in Virginia. One would expect a particularly strong need for normal — or
5 even augmented — collections three days before Christmas. Customers probably
6 wanted to use this Saturday to prepare mail that could be delivered in two days —
7 before Christmas. I certainly did.

8 The substantial majority of the instances of early collections involve rogue
9 districts that perform early collections on eves of holidays contrary to headquarters
10 policy.

11 **B. Customers Need Normal Collections on Eves of Holidays**

12 The Postal Service has provided no quantitative data or other reliable
13 information to suggest that early collections on eves of holidays meet the needs of
14 customers. In fact, available information suggests the contrary.

15 With few exceptions, the practice of making early collections on eves of
16 holidays is limited to Christmas Eve and New Year's Eve. Almost no mail-
17 processing plants in the country process outgoing First-Class Mail on Christmas Day
18 and New Year's Day. See Direct Testimony of Douglas F. Carlson — Part 1 at 6.
19 Therefore, for the vast majority of postal customers, Christmas Eve and New Year's
20 Eve precede at least one day on which customers will not have access to outgoing
21 mail processing. In 1999, Christmas Eve and New Year's Eve were on Friday. The
22 postal holidays were on Saturday, and the Postal Service ceased processing
23 outgoing First-Class Mail on Sundays in 1988. Therefore, in 1999, Christmas Eve
24 and New Year's Eve preceded two consecutive days with no outgoing First-Class
25 Mail service. In 2000, Christmas Eve and New Year's Eve were on Sunday, and the
26 postal holidays were on Monday. Consequently, early collections on Saturday,
27 December 23, 2000, were followed by two consecutive days with no outgoing First-
28 Class Mail service.

1 When customers are faced with one or two days of no outgoing First-Class
2 Mail service, I believe that, all else equal, they are more likely than otherwise to
3 need outgoing mail service on the day before the hiatus in outgoing mail service
4 begins. In addition, the demands of Christmas shopping, holiday parties, and other
5 holiday preparations are likely to distract some customers and cause them
6 inadvertently to delay mailing time-sensitive correspondence such as bill payments.
7 These customers need normal collections on Christmas Eve and New Year's Eve to
8 allow them to deposit their mail before a one-day or two-day hiatus in collections and
9 outgoing mail processing begins. Indeed, early collections on a Friday Christmas
10 Eve or New Year's Eve can effectively deny customers outgoing mail service for
11 *three* consecutive days.

12 I sometimes mail a small batch of late Christmas cards on Christmas Eve,
13 either because *I was too busy with other holiday activities to write and mail the cards*
14 earlier or because I decided to reply to other Christmas cards that I received earlier
15 in the month. It is reasonable to believe, in a season when mail volume spikes to
16 the highest levels of the year, that some customers will need to send mail related to
17 Christmas on Christmas Eve. I am not aware of any reason to believe that some of
18 these customers may not encounter this need late in the afternoon, thus creating a
19 need for collections made at the normal time.

20 In fact, while many districts were curtailing collections on Saturday, December
21 23, 2000, the acting manager of the South Jersey District saw such a potential
22 customer need for collections that he decided to conduct the Saturday collections
23 according to the weekday schedule. USPS-LR-C2001-1/4. The stated purpose was
24 to "accommodate mailers." The significance of this decision cannot be understated
25 because the acting district manager was William J. Bothwell, whose regular job was
26 as manager of Delivery Policies and Programs at Postal Service headquarters. As
27 manager of Delivery Policies and Programs, Mr. Bothwell oversaw collections policy
28 at the headquarters level. I have no reason to doubt Mr. Bothwell's understanding of
29 collections policy and the needs of customers. Quite the contrary, his understanding

1 is consistent with mine: At minimum, customers need normal collection services
2 before holidays, and they may even need additional collection services.

3 Mr. Bothwell's decision in the South Jersey District is significant for another
4 reason. Mr. Bothwell saw a need for later-than-normal collections on Saturday,
5 December 23, 2000. Meanwhile, the Appalachian District and the Royal Oak District
6 performed early collections at noon. Most districts in the country performed regular
7 Saturday collections. *I am unaware of any reason to believe that the needs of*
8 *customers for collection services on eves of holidays vary significantly from district to*
9 *district. I also am unaware of any information to suggest that customers in the*
10 *Appalachian District (West Virginia and western Virginia) and the Royal Oak District*
11 *have any less of a need for normal collection services on eves of holidays than*
12 *customers in the South Jersey District or any other district. Rather, I suspect that*
13 *the decisions in the Appalachian District and Royal Oak District to perform early*
14 *collections were based on considerations other than the needs of customers. The*
15 *districts that performed normal Saturday collections on Saturday, December 23,*
16 *2000, had it right. Mr. Bothwell went one step further and accommodated customers*
17 *in the South Jersey District by performing collections according to a weekday*
18 *schedule. The Appalachian District and Royal Oak District failed to meet the needs*
19 *of their customers.*

20 Customers' need for normal collections on New Year's Eve is obvious.
21 December 31 postmarks have substantial tax consequences for many customers.
22 *Although I am not an expert on federal, state, and local tax laws, I am aware that*
23 *some customers make charitable contributions on December 31 in order to claim a*
24 *deduction on their tax return for the tax year in which December 31 falls. I believe*
25 *that owners of businesses may make strategic decisions to pay certain bills on or*
26 *before December 31 in order to claim a deduction for a business expense in the tax*
27 *year in which December 31 falls. In addition, in more than one year, I have seen*
28 *customers arriving at a post office late in the afternoon on December 31 to request a*
29 *hand postmark on mail that, I believe, was destined to a state or local tax authority. I*

1 am unaware of any reason to believe that early collections on New Year's Eve fulfill
2 the needs of customers who need to obtain a December 31 postmark for their mail.

3 Postal Service press releases issued on December 12, 2001, and December
4 27, 2001, in Madison, Wisconsin, describe plans to close some post offices early on
5 New Year's Eve. The press releases acknowledge customers' concern for obtaining
6 December 31 postmarks. In underlined boldface text, the press releases state,
7 "Customers wishing to have their tax payments hand-postmarked on December 31st
8 are advised to mail early or observe early closing hours." Appendix 3. The fact that
9 customers are willing to go to the trouble of obtaining *hand* postmarks on December
10 31 underscores the critical importance of December 31 postmarks. While this press
11 release does not discuss changes to collection schedules, it does indicate that the
12 Postal Service is aware of the importance to some customers of December 31
13 postmarks.

14 Some undergraduate colleges establish a January 1 postmark deadline for
15 students to submit their applications. Since most post offices are closed on January
16 1, and since many people, including college applicants, have a tendency to wait until
17 the last day to mail important documents, one can reasonably assume that
18 December 31 postmarks are important to people who are trying to submit a timely
19 college application. In fact, intervenor David Popkin informed me of a visit that he
20 made to the General Post Office in Manhattan on January 1, 2001, to assist a high-
21 school student in mailing his college application. The postmark deadline for this
22 application was January 1. The General Post Office is one of the few post offices
23 that offers retail window service on New Year's Day. Mr. Popkin reported seeing
24 many other high-school seniors with the same objective of mailing their college
25 applications by the January 1 deadline while he waited 45 minutes in line for window
26 service. College applicants around the country who, hopefully, knew that they could
27 not wait until January 1 to mail their applications presumably considered a
28 December 31 postmark to be critically important.¹ Given that some students in the

¹ Customers who innocently rely on the holiday collection times posted on 4,016 collection boxes nationwide may wait until January 1 to deposit their mail. These holiday collection times almost

1 New York area waited until January 1, I have no reason to believe that students in
2 other cities would complete their applications early in the day on December 31 as
3 opposed to close to the normal collection time in their city.

4 Some volume of outgoing mail depends on business activity. If businesses
5 are open, they will generate mail, and if they are not open, they will not generate
6 mail. I have not examined business activity in every city. However, in cities in
7 which the Postal Service conducts early collections on eves of holidays, I doubt that
8 all businesses in those cities are closed after the early collection time that the Postal
9 Service establishes for those cities. For example, I doubt that every business in the
10 state of Connecticut was closed after noon on Christmas Eve in 2001, the final
11 collection time for collection boxes in Connecticut on Christmas Eve. Many people
12 are notorious for saving their Christmas shopping until Christmas Eve. People shop
13 in retail stores, and retail stores are businesses. Retail stores generate mail, and
14 they do not close before noon on Christmas Eve. Businesses such as retail stores
15 that are open likely have mail to deposit at the end of the day, as they would on any
16 weekday.

17 Office workers sometimes generate personal mail such as bill payments and
18 Christmas cards during the workday. They deposit their mail when they leave the
19 office at the end of the day. Thus, when businesses are open, not only do
20 businesses generate business-related mail, but their workers also generate some
21 personal mail.

22 Section VIII.A. explains the extent to which the Postal Service performs early
23 collections on eves of holidays. In short, the Postal Service fails to meet the needs
24 of customers when it performs early collections on the eves of holidays.

25 Few reasonable people, particularly those who have had the good fortune of
26 visiting New York City, would disagree with my belief that the New York Stock

always mislead customers into believing that holiday processing is available on all holidays including
New Year's Day. In fact, nearly all processing and distribution centers do not process outgoing mail
on New Year's Day. See section IX.

1 Exchange generates a certain amount of business activity in New York and cities
2 around the country. When the stock exchange is open, workers come to work in
3 brokerage houses, investment firms, and law firms in New York and elsewhere.
4 These businesses have support needs, such as photocopying and catering. Their
5 workers need to eat breakfast, brunch, and lunch in restaurants and delicatessens.
6 The photocopying outfits, caterers, restaurants, and delicatessens in turn employ
7 workers to support the business activity related to the New York Stock Exchange.
8 These workers generate business and personal mail. I conclude that collection
9 schedules will not meet the needs of customers if the collections are made prior to
10 the time when these businesses and workers would deposit their mail.

11 In 2000, the New York Stock Exchange closed at 1:00 PM on Monday, July 3,
12 2000. In 2001, the New York Stock Exchange closed at 1:00 PM on Christmas Eve,
13 but the stock exchange was open during *normal* hours on New Year's Eve. On each
14 of these days, the New York District performed final collections according to the
15 Saturday schedule. In the greater Wall Street area, including the tourist-populated
16 South Street Seaport, the typical final Saturday collection time is 8:30 AM. In the
17 business and retail areas of midtown Manhattan, the final Saturday collection time
18 typically is 1:00 PM or earlier. However, in April 2002 I discovered a collection box
19 at 9th Avenue and 34th Street, in the heart of midtown Manhattan, that has a final
20 Saturday collection time at 7:00 AM. Collection boxes under mail chutes inside
21 Manhattan office buildings typically have no Saturday collection at all. The collection
22 schedules in Manhattan on these eves of holidays surely failed to meet the needs of
23 customers. While business activity in Manhattan extends well beyond the New York
24 Stock Exchange, this single example should underscore the extent to which
25 business activity, and the mail that it generates, occurred in Manhattan after the time
26 at which the Postal Service performed final collections from collection boxes.
27 Similarly, the partial or full operation of the New York Stock Exchange on these eves
28 of holidays sparked identifiable business activity in cities around the country, activity
29 that often continued beyond the early collection time that the Postal Service
30 announced. For example, with the New York Stock Exchange open until 1:00 PM,
31 surely mail-generating business activity related to the stock exchange continued in

1 Connecticut cities beyond noon, the final collection time for collection boxes in
2 Connecticut on Christmas Eve in 2001.

3 This discussion should underscore two important conclusions. First, various
4 factors, including the impending holidays themselves, create a need for normal
5 collection service on eves of holidays. Second, early collections on eves of holidays
6 deny customers the level of collection service that they need on eves of holidays.

7 **C. Customers Need Accurate Information About Collection Services**

8 I believe that customers need accurate information about collection services.
9 If the Postal Service decides to perform early collections, customers need to know
10 this information. This need has two parts. First, when customers approach a
11 collection box on the eve of a holiday, they need to be aware, before they deposit
12 their mail, if the normal collection time will not apply. Second, customers need to
13 receive information about changes in collection times far enough in advance to allow
14 them to take alternate steps to deposit their mail.

15 The first point should be fairly obvious. Every postal customer has a right to
16 receive the service that the Postal Service advertises or otherwise promises. If a
17 postal customer approaches a collection box at 4:30 PM on a Monday that also
18 happens to be Christmas Eve, the customer should be able to rely on the collection
19 time posted on the collection box unless the customer has been informed of a
20 different collection time. If the collection box shows a final collection time on
21 weekdays at 5:00 PM and the customer deposits his mail in the collection box by
22 5:00 PM, the customer's mail should be collected and processed on Christmas Eve.
23 If this customer deposits his mail at 4:30 PM, but in reality the Postal Service
24 collected the box at noon, the customer may suffer financial harm from the delay.
25 Thus, customers need to have sufficient information on collection services before
26 they deposit mail to enable them to take alternative steps, if necessary, to expedite
27 their mail. Alternative steps might include a drive to a processing and distribution
28 center or the use of the Internet to pay a bill if customers cannot wait until after the
29 holiday for their mail to be collected and processed. In some cities, including New

1 York City, alternatives, even at processing and distribution centers, may not be
2 available. For example, the final collection time on Saturdays at the Queens P&DC
3 is 10:00 AM.

4 Customers also need to receive information about changes in collection
5 schedules early enough to allow them to make alternate plans to deposit their mail.
6 In the example above, if the customer did not learn about the early collections until
7 he arrived at the collection box at 4:30 PM, he might not have time to take his mail to
8 another collection box. For example, the post office in his city probably also
9 performed early collections. Or perhaps this customer does not drive and could not
10 obtain transportation in time to reach a post office that may or may not offer a later
11 collection. Or this customer may have scheduled his day so tightly that he simply
12 would not have time to search for a later collection. Customers could potentially
13 avoid some of these problems if they received notice of early collections on eves of
14 holidays with sufficient advance notice.

15 The Postal Service appears to understand the importance of notifying the
16 public of changes in collection schedules. A press release for the Central New
17 Jersey District dated December 7, 2001, announced that the Postal Service would
18 be observing a Saturday collection schedule on Christmas Eve and New Year's Eve
19 in 2001. The press release included the following sentence: "Please make note of
20 these important changes and plan your mailing activities accordingly." Appendix 4.
21 If changes to collection schedules are "important," customers obviously need to be
22 aware of the changes. The Postal Service also acknowledges the importance of
23 providing customers with *advance* notice of changes in collection schedules to allow
24 customers to adjust their mailing schedule. Response to DFC/USPS-36(a).

25 Indeed, when Postal Service headquarters authorizes early collections on
26 eves of holidays, the Postal Service requires field offices to inform the public.
27 Unfortunately, as I discuss in section VIII.D., field officials have a loose standard for
28 the communication effort that constitutes notice to the public. Setting this issue
29 aside for a moment, the Postal Service's policy to inform the public reflects the

1 Postal Service’s acknowledgement that the public needs to be informed of changes
2 in collection schedules. More generally, section 316 of the POM requires collection-
3 times labels to reflect the “correct” collection times — once again demonstrating the
4 importance of notifying the public about collection times.

5 In sum, customers need to know about early collections before they deposit
6 their mail, and they must receive this information with sufficient advance notice to
7 allow them to make alternate plans if they need to deposit mail late in the day on the
8 eve of a holiday.

9 **D. Notice to the Public Is Insufficient**

10 Setting aside the fact that early collections harm customers to some extent no
11 matter how good the notice to the public is, I believe that notice to the public about
12 early collections on eves of holidays must reach every postal customer. Moreover,
13 this notice must reach customers with sufficient advance notice to allow them to
14 make alternate arrangements.² Regrettably, the notice that the Postal Service
15 provides to the public when it performs early collections on eves of holidays is
16 insufficient. The insufficiency of the notice is disturbing and appalling.

17 In the apparent view of most district postal officials, the duty to notify the
18 public ends when the Postal Service issues a press release. Signs in post offices
19 may or may not be posted. Moreover, the Postal Service does not want to be
20 bothered to post a simple sign or sticker on collection boxes to notify mailers of the
21 changes in collection schedules. See Response to DFC/USPS-15 and DFC/USPS-
22 36. I would be surprised if even a significant minority of customers receives notice
23 of changes in collection schedules when the Postal Service’s publicity effort is
24 limited to a simple press release. A survey that I conducted confirms my
25 expectation. I discuss this survey in section VIII.D.8.

² I do not mean to suggest that the Postal Service can avoid harm to the public by providing sufficient notice because early collections will deny the public a needed service even if the public is fully informed. This discussion focuses solely on the issue of the *sufficiency* of the notice for informing the public of plans for early collections, as misguided as those plans may be.

1 I can confirm based on two personal experiences in New York that notice to
2 the public is grossly deficient.

3 **1. Types of Notice to the Public**

4 Districts planning to conduct early collections on eves of holidays must submit
5 a spreadsheet titled "Suspended Operations" to the manager, Customer Satisfaction
6 Measurement, at Postal Service headquarters. I obtained copies of these
7 spreadsheets for the December 2001 holiday period through the Freedom of
8 Information Act.

9 The spreadsheet requires each district to report the method of notifying the
10 public. Of the 15 districts that performed early collections on Christmas Eve or New
11 Year's Eve, nine used press releases as the *sole* method of communicating this
12 information to the public. In section VIII.D.2., I will discuss the shortcomings of press
13 releases as an exclusive communication strategy, particularly in densely populated
14 urban areas. These nine districts typically represented the largest, most-urban of
15 the 14 districts that performed early collections in December 2001. These nine
16 districts did not bother to post signs in post-office lobbies. To say the least, post-
17 office lobbies are locations where postal customers frequently are found. Another
18 district used a newspaper advertisement as the exclusive communication strategy.
19 Without signs posted in post offices, this communications strategy guaranteed that
20 the substantial number of customers who do not read newspapers would not have
21 seen the advertisements — not to mention those customers who read different or
22 non-local newspapers, live in different cities, or otherwise missed the advertisement
23 when it was published in the newspaper that they read regularly. Other districts
24 used only newspaper advertisements and lobby displays. In the Middlesex-Central
25 District, the lobby "displays" apparently were signs on letter-size pieces of paper.
26 This communications strategy suffers from the same deficiencies as the one that
27 relies exclusively on newspapers, except that some customers probably did learn
28 about the early collections from signs in lobbies.

1 The Postal Service confirmed that no headquarters office issues signs or
2 other preprinted informational notices to post offices for them to use to advise
3 customers of early collections on eves of holidays. Response to DFC/USPS-5.

4 **2. Press Releases Don't Reach the Public**

5 For media announcements to reach the public, notices of changes in
6 collection schedules generally must be published multiple times, in multiple types of
7 media (e.g., newspapers, radio, and television), and in multiple versions of a single
8 medium (more than one newspaper, radio station, or television station) in order to
9 ensure that a majority of the audience receives the news. Postal Service notices of
10 changes in collection schedules fail to achieve the saturation necessary to reach
11 even a majority of the audience, not to mention all customers who use collection
12 boxes and lobby drops to mail letters.

13 In my observation, in large metropolitan areas, some people who live in
14 smaller towns and cities read only the newspaper from the largest city in their area,
15 while other people read only their local small-town newspaper. Consider the Postal
16 Service's challenge of informing customers in the Southeast New England District of
17 early collections on Christmas Eve in 2001. The Southeast New England District
18 includes southern suburbs of Boston, the city of Brockton, Cape Cod, and Rhode
19 Island. I believe that many of the residents in the Southeast New England District
20 read only the *Boston Globe* and receive their news only from Boston radio and
21 television stations. It is hard to imagine that the *Boston Globe* publishes notices
22 about changes in collection schedules in Providence, Rhode Island. I also doubt
23 that Boston radio and television stations announce changes in collection schedules
24 for Brockton or Providence. In fact, it would be fanciful for the Postal Service to
25 imagine a hit-music radio station in Boston announcing changes in Postal Service
26 collection schedules in Rhode Island during the 60-second hourly news break on the
27 station's morning show — a news break that occurs before many of the stations'
28 young listeners are even awake. Yet people who listen primarily or exclusively to
29 hit-music radio stations are postal customers, too, entitled as much as any other
30 customer to notice of changes in collection schedules.

1 This example shows the futility of relying on press releases to inform the
2 public of important details of postal operations in large, overlapping metropolitan
3 areas. The Southeast New England District example is, by no means, an isolated
4 example. The same type of situation would exist for residents in northern and
5 central New Jersey and Westchester County, New York, many of whom receive their
6 news exclusively from New York newspapers, television stations, and radio stations.
7 Most New York media outlets are not going to announce changes in collection
8 schedules in the Northern New Jersey District and the Central New Jersey District.
9 Both of these New Jersey districts performed early collections on Christmas Eve and
10 New Year's Eve in 2001, and the altered schedules in the Northern New Jersey
11 District were different from the altered schedules observed in New York City. If any
12 New York media outlets actually announced changes in collection schedules in New
13 York, they would have needed to ensure that they did not imply that the same
14 changes applied in Northern New Jersey. Of course, when the Postal Service relies
15 on media outlets to communicate changes in collection schedules, the Postal
16 Service loses control of the information and cannot ensure that it is communicated
17 accurately, when it is communicated at all. Yet *accurate* dissemination of this
18 information is critical to notifying the public of changes in collection schedules.

19 I would expect that many Connecticut residents also receive their news
20 primarily or exclusively from New York media outlets. Once again, the early
21 collections on Christmas Eve in Connecticut were different from the early collections
22 in New York.

23 My brother lives in the Southeast New England District, works in Boston, and
24 receives his news primarily from Boston media outlets. He was unaware of the early
25 collections on Christmas Eve in 2001 until I told him afterward. I found no articles
26 when I conducted on-line searches in the *Brockton Enterprise* and *Providence*
27 *Journal*.

28 Press releases suffer from another shortcoming. To the extent that only
29 English-language media outlets report the information in the press releases, the

1 information will not reach people who cannot read or speak English. Also, if only
2 newspapers publish the information in the press releases, people who have poor
3 eyesight or similar disabilities will not receive the information.

4 Perhaps the largest problem with press releases is simply succeeding in
5 having the information published or broadcast at all. Recently, I gained insight on
6 this issue from Carl Nolte, a reporter with the *San Francisco Chronicle*. Mr. Nolte
7 has more than 40 years of experience in the newspaper business, including 18
8 years as an editor. He doubts the effectiveness of press releases in communicating
9 changes in collection schedules to the public because, he argues, newspapers and
10 radio and television stations are “overwhelmed” by press releases. He informed me
11 that editors cannot look at the “hundreds and hundreds” of press releases that they
12 receive every day, let alone publish or broadcast them. In addition, public-service
13 announcements must compete for space or air time not only with other news but
14 also with whatever else is being published or broadcast. Anecdotally, he believes
15 that his newspaper discards 90 percent of the press-release material that it receives.

16 **3. Newspaper Advertisements Reach Only Newspaper Readers**

17 In response to a FOIA request that I submitted in January 2002, the Postal
18 Service provided a copy of an advertisement that appeared in several Connecticut
19 newspapers announcing early collections on Christmas Eve in 2001. This
20 advertisement appears as Appendix 5. In stark contrast to other districts, as
21 described in section VIII.D.1., *supra*, this advertisement reflects a genuine, albeit
22 insufficient, effort to inform the public. One principal shortcoming of the
23 advertisement is that it has the potential to reach only postal customers who read
24 newspapers. For some postal customers, newspapers are a luxury that they cannot
25 afford. Moreover, the advertisement will reach only customers who read a particular
26 section of particular newspapers on a particular day.

27 **4. Press Releases Do Not Inform a Mobile Society of Changes in** 28 **Collection Schedules**

1 Every postal customer has a right to receive adequate postal services without
2 discrimination based on residence or any other factors. Every postal customer has a
3 right to receive the same level of service from every collection box as other
4 customers. Therefore, if the Southeast New England District decides to perform
5 final collections on Christmas Eve at noon, the Southeast New England District has
6 an obligation to notify every customer who might use a collection box in the district
7 after noon but before the normal collection time posted on the collection box. As an
8 example, a customer arriving at the airport in Providence from Illinois or California
9 has as much right to the collection services provided at the collection box inside the
10 Providence airport as a resident of Providence, a resident of Rhode Island, a
11 resident of the Southeast New England District, or anyone else. The collection box
12 inside the Providence airport has a final weekday collection at 5:00 PM. Travellers
13 arriving at the airport have just as much of a right to be notified of changes in
14 collection schedules than local residents. If they are not notified, they have a right to
15 receive the service posted on the collection box.

16 Upon closer examination, the example of the airport in Providence shows why
17 the practice of performing early collections on eves of holidays is fraught with
18 problems. The United States is a land of mobile citizens and residents. People like
19 to travel, and they travel often. In any day, every postal district receives visitors, and
20 outgoing mail, from people who do not reside in that district. These customers may
21 fly into the district, drive into the district, or even arrive by ship or rail. These
22 customers may have a final destination in the district, such as a job or a friend or
23 relative's house, or they may simply be passing through. All postal customers have
24 a right to receive the same level of service from collection boxes as customers who
25 reside in the districts where the collection boxes are located. Therefore, the Postal
26 Service must provide notice of early collections to all customers who might otherwise
27 use collection boxes to deposit mail after the time of the early collection but before
28 the time posted on collection boxes for the day of the week corresponding to the eve
29 of the holiday.

1 This obligation to all customers demonstrates the difficulty of providing
2 sufficient notice to the public of early collections. Even if the Postal Service were to
3 saturate the print and *electronic media* in a particular district to the point where every
4 postal customer would be expected to have read or heard the notice about early
5 collections at least once, the Postal Service still would fail to inform customers who
6 arrive in the district on the eve of the holiday and are not privy to the media
7 announcements. Of course, marketing and advertising experts could only dream of
8 an advertising campaign, not to mention the budget therefor, that would actually
9 reach every person living in a particular area.

10 In short, no Postal Service media campaign, whether it consists of a simple
11 press release or *paid display advertisements in newspapers*, will reach all potential
12 customers.

13 **5. Notices Issued to the Public Often Are Incorrect or Confusing**

14 When the Postal Service announces early collections on eves of holidays, the
15 announcements sometimes are confusing or incorrect. The Connecticut
16 advertisement states that “*mail deposited in postal collection boxes will be picked up*
17 *for the last time at noon on December 24th.*” Although I am unable to access the
18 Collection Box Management System database as a result of the Postal Service’s
19 illegal defiance of Commission Order No. 1331, I believe that some collection boxes
20 *in Connecticut probably have a normal final weekday collection time before noon.*
21 This advertisement suggests that mail deposited in any collection box by noon will
22 be collected on Christmas Eve, even those with normal final posted collection times
23 in the morning. I highly doubt that the *Postal Service performed late collections from*
24 *some boxes and early collections from others.* More likely, the collection boxes with
25 morning collections were collected in the morning, and collection boxes with
26 afternoon collections were collected at noon. Even this attempt to inform the public
27 of the changes in collection schedules probably provided incorrect and misleading
28 information.

1 The December 14, 2001, press release from the Southeast New England
2 District stated that “the final pick-up of all collection mailboxes in the district will take
3 place at 12 noon on December 24th.” Once again, due to the Postal Service’s
4 defiance of Commission Order No. 1331, I am unable to confirm that collection
5 boxes exist in the district that have a normal final weekday collection time prior to
6 noon. However, I believe that such collection boxes probably exist. Did the
7 Southeast New England District delay collection of these morning collection boxes
8 until noon on Christmas Eve, effectively announcing late collections for some boxes
9 and early collections for other boxes? I doubt it. More likely, the collection boxes
10 with morning collections were collected in the morning, and collection boxes with
11 afternoon collections were collected at noon. This press release most likely
12 provided misleading information to the public.

13 This confusing announcement is not the first misleading announcement
14 produced for the Southeast New England District. In my complaint at Exhibit 3, I
15 presented a printout of an announcement from the district’s Web site. It stated, “The
16 last pickup of collection boxes in these ZIP Codes will be completed by 12:00pm on
17 Friday, December 24.” This sentence gave the Postal Service the right to collect
18 any box beginning one minute after midnight on the morning of December 24, 1999.
19 Could a customer have deposited mail on Friday, December 24, 1999, at 11:00 AM
20 and been assured of same-day collection? Suppose the normal final weekday
21 collection time posted on the collection box was 10:00 AM. The answer is unclear.
22 How about a collection box with a normal final weekday collection time of 5:00 PM?
23 Once again, the answer is unclear because collections were to be *completed* by
24 noon. If one reads this notice literally, collection boxes could have been collected for
25 the final time at 12:01 AM or later, thus rendering collection boxes virtually useless
26 to customers who needed to send important mail on Christmas Eve and New Year’s
27 Eve. On the other hand, some customers might have read this notice carelessly and
28 concluded that they would be safe if they deposited their mail by noon. However,
29 perhaps the announcement meant exactly what it said: The last collection box was
30 collected at noon or earlier, so some collection boxes necessarily were collected
31 before noon.

1 Despite the attention that this complaint should have brought to public
2 announcements from the Southeast New England District, the district is still misfiring
3 in stating its schedule changes clearly and accurately.

4 The Central Florida District used similar imprecise language, noting in press
5 releases for Christmas Eve and New Year's Eve in 2001 that "mail placed in all
6 collection boxes will be collected by noon that day." It is unclear whether mail
7 deposited at 11:30 AM in a collection box that had a posted collection time of 1:00
8 PM would have been collected on the day of deposit. Perhaps no collection was
9 performed after noon, just as the notice says.

10 The December 5, 2001, press release for the Westchester District in New
11 York puts the burden on customers to research and decipher the changes in
12 collection schedules for Christmas Eve and New Year's Eve. The press release
13 begins, "The United States Postal Service's Westchester Performance Cluster has
14 announced that Post Offices throughout the 11 New York counties that the district
15 serves will operate on a Saturday schedule on both Monday, Dec. 24 and Dec. 31."
16 The next paragraph reads, "Postal customers are advised to contact their local office
17 for specific hours, which will include retail operations and mail pick up collection
18 hours." A person reading this press release might tentatively conclude that the
19 statement "operate on a Saturday schedule" means that collection boxes will be
20 collected according to a Saturday schedule. This conclusion, which I would not
21 necessarily expect the typical postal customer to reach, would stand only until the
22 customer read the next sentence, which requires customers to contact their local
23 post office for specific collection times. In short, customers in the Westchester
24 District were responsible last December for making the effort to contact their local
25 post office to learn about changes in collection times. This approach to notifying the
26 public seems to ignore the public's right to be informed of changes in collection
27 schedules by making it as difficult as possible for customers to learn about the
28 changes and, therefore, extremely unlikely that customers will be informed.

1 The notice suffers from another deficiency. I doubt that many postal
2 customers know the geographic reach of the Westchester Performance Cluster or
3 the 11 counties that the district serves. Thus, customers who received this unhelpful
4 announcement may not have known whether it applied to them. In fact, as I was
5 preparing my testimony, I initially concluded that the Westchester Performance
6 Cluster included only ZIP Codes 105–109. When I received information from
7 headquarters in response to my FOIA request, I discovered that the Westchester
8 Performance Cluster includes ZIP Codes 124–127, a region that includes the
9 Hudson Valley. Even the Postal Service’s own policy on notifying the public of
10 changes in collection schedules states that “This notification must be specific as to
11 times, dates, and locations (preferably by 5-digit, but 3-digit area will be
12 acceptable).” Response to DFC/USPS-17. The Westchester District’s
13 announcement was not specific as to time or location.

14 This press release also makes the mistake of requiring media outlets to
15 perform research and detective work to obtain enough information to make the press
16 release useful to their audience. By requiring media outlets to perform research to
17 obtain information that a good press release should contain, the Postal Service
18 reduced the likelihood that the media would pass the information along to the public.
19 Mr. Nolte’s insight about press releases is noteworthy when considering the
20 improbability that any media outlet took the time to follow up on the Westchester
21 District’s news release to obtain information that would be useful to its audience.

22 Similarly, the June 30, 2000, press release from the New York District
23 announcing early collections on Monday, July 3, 2000, fails to specify where the
24 early collections will occur. The byline is “New York, NY,” but the press release
25 does not state that the early collections will occur in Manhattan and Bronx. Since
26 early collections did not occur in the Triboro District (Brooklyn, Queens, and Staten
27 Island), this press release is either over-inclusive or under-inclusive. The press
28 release is over-inclusive if it is read to refer to all of New York City. It is under-
29 inclusive if “New York, NY” is read according to its meaning in standard Postal

1 Service addressing, since "New York, NY" is a valid address for Manhattan only, not
2 Bronx.

3 The sign announcing noon collections on Christmas Eve in the Middlesex-
4 Central District in Massachusetts (ZIP Codes 014–018) advises customers to
5 deposit mail in "neighborhood collection boxes" by noon on Christmas Eve. Some
6 customers may reasonably interpret "neighborhood" as meaning collection boxes
7 located in residential neighborhoods, as compared to boxes located in busy
8 commercial districts. The private, internal supporting documentation, however,
9 indicates that *all* collection boxes were collected at noon.

10 **6. Customer Confusion at Stations and Post Offices**

11 In many cities, particularly large cities, the Postal Service treats collection
12 boxes located in front of stations and post offices as regular street collection boxes
13 and assigns those boxes to motorized collection routes. Often, these collection
14 boxes are collected at a time convenient for the motorized collector to collect them,
15 with *no* thought given to the existence of staff inside the station or post office who
16 could collect the boxes shortly before the final dispatch of outgoing mail, as Postal
17 Service policy requires. In fact, in some cities, the staff of stations and post offices
18 does not have access to the collection boxes anymore.

19 This practice of assigning collection boxes in front of staffed postal facilities to
20 motorized street collection routes often leads to absurd results that deny customers
21 appropriate collection services. For example, the latest collection time on Saturdays
22 at any street collection box in Flushing, New York, is 3:00 PM. The collection boxes
23 located in front of the Flushing main post office have a 3:00 PM collection. (The final
24 collection time at the Queens P&DC is only 10:00 AM.) However, the Flushing post
25 office is open for window service until 5:00 PM on Saturdays. Customers must find
26 parking in this congested area and take their mail inside the post office because the
27 Postal Service cannot be troubled to collect mail from the boxes in front of the post
28 office after 3:00 PM. Similarly, in front of the large General Post Office in
29 Manhattan, the final collection time on Saturdays is 1:00 PM, even though staff are

1 available in this post office late into the evening to collect mail and take it across the
2 street to the Morgan P&DC.

3 When the Postal Service performs early collections on eves of holidays, I
4 believe that, in many instances, the collection boxes located in front of staffed postal
5 facilities are collected at the time established for the early collections in the city.
6 Meanwhile, sometimes the postal facilities themselves continue to offer retail window
7 services until the normal closing time. I am concerned that customers, seeing that
8 the post office is open for business, may deposit their mail in the collection boxes in
9 front of the post office, unaware that the normal weekday collection schedule posted
10 on the boxes will not apply on the eve of a holiday.

11 Early collections on eves of holidays in front of delivery units are particularly
12 unnecessary. Delivery units always have a late-afternoon dispatch to transport to
13 the processing plant the outgoing mail that carriers collect on their routes.
14 Particularly since the Postal Service never announces that mail that customers leave
15 for their letter carrier will not be dispatched on the same day, Christmas Eve and
16 New Year's Eve are no different: when the carriers return from the streets, they bring
17 back collection mail, and the Postal Service transports this mail to the processing
18 plant in the late afternoon or early evening — probably according to the normal
19 weekday dispatch schedule. In fact, I would expect that many carriers would return
20 to the office *later* than the normal time on Christmas Eve due to heavy mail volume,
21 and their delivery unit may even have a special late-evening dispatch to
22 accommodate heavy mail during the Christmas holiday period. No reason exists
23 why the Postal Service cannot or should not collect the mail from the collection
24 boxes located at the delivery units according to the normal weekday schedule or, at
25 minimum, before the dispatch truck departs, even if early collections are performed
26 elsewhere in the city. Postal Service policy requires collections to be made as late
27 in the day as possible, 15 to 30 minutes before the dispatch truck departs. Late-
28 afternoon collections at delivery units would help to offset the harm to customers that
29 early collections on eves of holiday cause, denying customers access to outgoing
30 First-Class Mail service for several hours.

1 **7. My Personal Experiences**

2 Based on my own personal experience, I am quite confident in stating that the
3 Postal Service is failing badly in notifying the public of early collections on eves of
4 holidays.

5 **a. New York — Independence Day in 2000**

6 The Postal Service decided to collect mail according to a Saturday schedule
7 in Manhattan and Bronx on Monday, July 3, 2000. I was in Manhattan on vacation
8 at various times on Friday, June 30, 2000, and Saturday, July 1, 2000. On both
9 occasions, I visited the famous General Post Office in midtown Manhattan, which
10 New York residents know as the main post office. The General Post Office offers
11 retail window service 24 hours a day, seven days a week. As part of my general
12 interest in visiting post offices, I spent 10 to 15 minutes walking around the lobby,
13 reading various signs. Nowhere did I see any notices informing the public that the
14 Postal Service would be observing a Saturday collection schedule on Monday, July
15 3, 2000. The Postal Service does not assert that signs were posted. Response to
16 DFC/USPS-35(d). I was not looking for notices, of course, because I did not expect
17 that collections on Monday, July 3, 2000, would occur at any time other than the
18 posted weekday collection time. Nonetheless, I was reading signs, and I saw no
19 notices.

20 During my visit to Manhattan, I examined the collection times on several
21 collection boxes. I saw no notices informing the public that the collection boxes
22 would be collected according to the Saturday schedule on Monday, July 3, 2000.

23 On Saturday, July 1, 2000, I specifically recall marvelling at the population
24 density of New York and how streets that I visited in Manhattan and Queens were
25 filled with people even on a Saturday evening. When I returned home and spoke to
26 people about my trip, I even remarked about the constant flow of people in New
27 York. I do not believe that this activity disappears on the eve of a holiday, effectively
28 transforming the streets of New York from a bustling metropolis into a deserted town

1 in which no postal customer would mail a letter in the late afternoon on the eve of a
2 holiday.

3 Given the research that I have conducted on the issue of early collections on
4 eves of holidays, and given my pursuit of a formal complaint under 39 U.S.C.
5 § 3662 concerning this practice, I believe that I am more likely than the typical postal
6 customer to notice signs or other announcements from the Postal Service intended
7 to communicate changes in postal services to the public. Unfortunately, I saw no
8 signs or announcements during my visit to New York two days before the early
9 collections were performed. I did not learn about the early collections until the
10 Postal Service responded to interrogatory DFC/USPS-14.

11 Based on my own personal experience, I am confident that the Postal Service
12 did not provide notice sufficient to inform postal customers of early collections on
13 Monday, July 3, 2000. After all, I was in New York immediately before Monday, July
14 3, 2000, and I received no notice. In response to interrogatory DFC/USPS-35(g),
15 the Postal Service stated that it published a public notice in the New York *Daily*
16 *News* on Saturday, July 1, 2000, ostensibly to inform the public of the early
17 collections. I researched this public notice to measure the sufficiency of the notice in
18 informing the public of the early collections. The public notice is buried on page 52
19 in the classified-advertisements section of the Saturday newspaper. In Appendix 6, I
20 have presented a reduced photocopy of the *Daily News* page on which this public
21 notice appears. With apologies in advance to my readers, to demonstrate the low
22 probability that more than handfuls of postal customers, let alone most or all postal
23 customers, saw this notice, I have refrained from circling the public notice and will
24 leave it to my readers to find it on the cluttered page. The Postal Service apparently
25 believes that a tiny notice buried in the classified section of one New York
26 newspaper on a Saturday discharges its obligation to notify the public of changes in
27 collection schedules. I disagree. I believe that all postal customers, not only those
28 who are shopping the *Daily News* on a Saturday for a used Buick LeSabre, have a
29 right to be informed of Postal Service plans to perform early collections on eves of
30 holidays. Among other customers, this notice would not have reached people who

1 commute to work in New York but live outside New York City and read their
2 hometown newspaper, nor would it have reached New York City residents who read
3 different newspapers, customers who do not read any newspapers, tourists and
4 visitors, and so on. Common sense, buttressed by my own personal experience,
5 confirms that the Postal Service did not provide sufficient notice to the public of early
6 collections on Monday, July 3, 2000.

7 **b. New York — Christmas Eve and New Year's Eve in 2001**

8 The tiny public notice buried in the classified ads of the *Daily News* in many
9 ways sums up this case quite nicely, leaving little doubt that the Postal Service
10 makes a paltry effort to inform the public of early collections on eves of holidays.
11 However, one could argue that the deficiency in the notice to the public was even
12 worse for Christmas Eve and New Year's Eve in 2001.

13 Press releases provided to me under FOIA revealed that the Triboro District
14 and New York District, which together cover New York City, performed collections on
15 Christmas Eve and New Year's Eve in 2001 according to a Saturday schedule,
16 rather than the weekday schedule posted on collection boxes.

17 On December 18, 2001, I viewed collection boxes in downtown Brooklyn. I
18 saw no notices indicating plans to conduct early collections on Christmas Eve or
19 New Year's Eve. Also on this day, I visited Station B in Jamaica, Queens. I saw no
20 notices in the station or on the collection box outside informing customers of plans
21 for early collections on Christmas Eve or New Year's Eve. On December 19, 2001, I
22 viewed several collection boxes in the Long Island City section of Queens. Once
23 again, I saw no notices indicating plans for early collections on Christmas Eve or
24 New Year's Eve.

25 Perhaps most troubling of all was my experience in Manhattan. On
26 December 19, 2001, I visited the General Post Office at approximately 5:30 AM. I
27 patiently walked through the lobby looking at signs and notices posted on walls and
28 bulletin boards, specifically seeking information about changes in collection
29 schedules for Christmas Eve and New Year's Eve. I saw none. Next, I visited a

1 window clerk. After asking the clerk whether she could sell me some United We
2 Stand postage stamps, I asked her whether the Postal Service would be performing
3 collections from collection boxes in Manhattan according to the normal Monday
4 schedule on Christmas Eve. She said yes. Later that morning, I called the main
5 telephone number for customer service in Manhattan that was listed in the telephone
6 directory. I asked the person who answered the telephone whether the Postal
7 Service would be performing collections on Christmas Eve according to the normal
8 weekday schedule. She said yes. Next, I telephoned the Public Affairs and
9 Communications office from a telephone at a security desk inside the General Post
10 Office. (I had sought to visit the office, but a security guard prevented me from
11 entering the building.) The person who answered the telephone promised to send
12 me any relevant press releases. However, I received no press releases, although
13 my subsequent FOIA request in January produced the press releases. Finally, while
14 I was in Manhattan, I also viewed several collection boxes, and no collection box
15 informed the public of early collections on Christmas Eve. When I departed New
16 York later in the day, I believed that the Postal Service would be performing
17 collections in New York on Christmas Eve according to the normal Monday
18 collection schedule.

19 I was stunned when I received press releases in response to my FOIA
20 request indicating that the Postal Service had, in fact, performed collections
21 according to a Saturday schedule on Christmas Eve and New Year's Eve. I
22 submitted a follow-up FOIA request to Public Affairs and Communications on
23 January 25, 2002, requesting documents depicting newspaper clippings showing
24 that the notices concerning early collections on Christmas Eve or New Year's Eve
25 had actually appeared in a newspaper. The Postal Service completely ignored my
26 FOIA request in direct violation of the statute requiring a response within 20 working
27 days. Thinking that the New York District might, once again, have published a public
28 notice buried in the classified ads of the *Daily News*, I spoke with the two employees
29 at the *Daily News* who handle public and legal notices, both in classified and display
30 advertising. Both employees said that they would have handled any such notice,
31 and they did not recall a notice for Christmas Eve or New Year's Eve in 2001. Both

1 employees also checked their computer systems. They found no record of
2 advertisements. (I even asked one of the employees whether she was aware of the
3 early collections on Christmas Eve or New Year's Eve, and she said no.) Unless an
4 advertising agency placed an advertisement for the Postal Service under the
5 advertising agency's name and these advertisements somehow were published
6 without the knowledge of the employees who normally handle these types of
7 advertisements, I am quite confident that the Postal Service published no notice
8 whatsoever in the *Daily News* in December 2001. While the notice to the public for
9 Monday, July 3, 2000, was grossly deficient, the absence of notice in December
10 2001 arguably was even worse.

11 Next, I checked the on-line archives of the *Daily News* and the *New York*
12 *Times* to determine whether notice of the early collections might have appeared in a
13 regular news article. I found no articles.

14 As far as I can tell, the Postal Service may have provided no notice to the
15 public of the early collections on Christmas Eve and New Year's Eve in New York
16 City in 2001. I saw no notices in post offices, located no purchased advertisements
17 in the *Daily News*, and uncovered no indication that any media outlet transmitted the
18 information contained in the Postal Service's press releases. However, even if
19 notice appeared in some newspapers, I failed to discover the early collections four to
20 five days before Christmas Eve despite making repeated, appropriately directed
21 inquiries specifically seeking to uncover this information. My experience is
22 particularly troubling because the purpose of notice to the public is to inform people
23 of changes in services that they may not have been expecting. Not only did I fail to
24 see any evidence of notice that would have informed the typical postal customer of
25 the early collections, but I also failed to obtain the information despite several
26 questions asking for precisely this information. If I was unable to obtain information
27 on early collections by asking a postal clerk, calling customer service, calling and
28 attempting to visit Public Affairs and Communications, reading the notices in the
29 General Post Office, and examining numerous collection boxes, I do not understand

1 how postal customers were supposed to learn about early collections in New York
2 on Christmas Eve.

3 The persistence of my inquiries on December 19, 2001, about early
4 collections on Christmas Eve does not reflect the behavior of most postal customers.
5 While I do not believe that most postal customers have any less of a desire or need
6 to receive accurate information about mail collection times than I do, I highly doubt
7 that most postal customers think to inquire about changes in collection schedules;
8 rather, they expect normal collection services to be provided unless they receive
9 notice to the contrary. In fact, I see no reason to believe that customers in New York
10 have ever been aware of the practice of making early collections on eves of
11 holidays, so they would have no reason even to *think* to inquire. In short, if I was
12 unable to obtain accurate information from the resources available to me in New
13 York, it is hard for me to imagine how the Postal Service managed to inform the
14 remainder of its customers.

15 **c. 1-800-ASK-USPS**

16 On December 24, 2001, I telephoned 1-800-ASK-USPS. I asked whether the
17 Postal Service was performing collections at the normal weekday time on Christmas
18 Eve. The representative, whose name was Karen, said yes. I now know that 14
19 districts performed early collections on Christmas Eve.

20 **d. Pasadena — Thanksgiving in 2001**

21 On the Friday after Thanksgiving in 2001, I accompanied a friend to the Plaza
22 Station on Colorado Boulevard in downtown Pasadena, a large station located in a
23 vibrant, revitalized shopping district. We entered the lobby of the post office in the
24 late afternoon and were surprised to see that all the retail windows were closed. My
25 friend needed to mail a parcel at the retail window, and I had several letters to mail,
26 including at least one bill payment. We thought that perhaps this station was no
27 longer a functioning retail facility because we could not understand why it was not
28 open for business. I proceeded to deposit my letters in the lobby drop, since the
29 collection was scheduled for 5:45 PM, 1½ hours later. On the way out of the lobby, I

1 noticed a sign, printed in a flowery sort of font, indicating that this station would be
2 closed on Thanksgiving Day and the Friday after Thanksgiving. At this moment, I
3 recognized the closure of this station as a cost-saving tactic, as a station in San Luis
4 Obispo, which is located in the same district as Pasadena, also had a sign on the
5 door on the previous day indicating that it would be closed on the Friday after
6 Thanksgiving.

7 I was even more surprised when I discovered that my test mail that I
8 deposited in the lobby drop of the Plaza Station in Pasadena was not postmarked
9 until Saturday, November 24, 2001. Even though the Plaza Station was a staffed
10 delivery unit, I suspect that the Postal Service failed to perform the posted collection
11 because the station was closed on the Friday after Thanksgiving.³ I, and probably
12 other customers as well, would have appreciated a sign on the lobby drop warning
13 us that our mail would not be postmarked until Saturday and that we, perhaps,
14 should use the collection boxes located outside instead. As I indicated previously, I
15 did not notice the sign indicating that the post office would be closed on Friday after
16 Thanksgiving until I was exiting the building, searching for an explanation as to why
17 no retail window service was being provided and too late for me to retrieve my mail
18 as a precaution. Even still, the sign did not indicate that the lobby drop was affected
19 by the closure, too.

20 **8. Results of My Survey**

21 To test my conclusion that the Postal Service is failing to notify customers of
22 early collections on eves of holidays, I conducted a survey. I purchased a
23 commercial mailing list of names of postal customers in 13 districts that performed
24 early collections on Christmas Eve or New Year's Eve in 2001. Using double reply
25 post cards, I sent each randomly selected person a brief explanation of the purpose
26 of the survey. I customized the reply half of each post card to ask a question
27 specific to the district. For example, the question for the Long Island District was:

³ On February 12, 2002, I submitted a FOIA request for the document that should confirm whether the lobby drop was collected on Friday, November 23, 2001. The Postal Service has ignored my FOIA request.

1 On Christmas Eve and New Year's Eve last year (Monday, December 24,
 2 2001, and Monday, December 31, 2001), were you aware that the U.S.
 3 Postal Service performed the final collection of mail from blue collection
 4 boxes on Long Island at **1:00 PM**, even if a weekday collection time later than
 5 1:00 PM was posted on the collection boxes?

6 I provided two answer choices: yes and no.

7 On April 3, 2002, I mailed 238 surveys. As of April 22, 2002, I had received
 8 30 responses from all 13 districts. Only three of the 30 respondents were aware of
 9 the early collections in December 2001. The remaining 27 respondents indicated
 10 that they were not aware of the early collections. Eighteen of the surveys have been
 11 returned as undeliverable. Table 1 summarizes the results by district. For clarity, I
 12 have reported the "yes" responses under the "Aware" column and the "no"
 13 responses under the "Not Aware" column. The "Total Surveys Sent" column
 14 excludes surveys that were returned as undeliverable, since these surveys did not
 15 reach their destination.

16 **Table 1. Summary of Survey Results**

District	Aware	Not Aware	Total Surveys Sent
Albany	1	3	16
Appalachian	2	1	19
Boston	0	3	18
Central Florida	0	1	16
Central Illinois	0	2	8
Central New Jersey	0	2	19
Connecticut	0	2	19
Long Island	0	3	20
Middlesex-Central	0	3	22
New York	0	3	19
SE New England	0	2	20
Triboro	0	1	12
Westchester	0	1	12
Total	3	27	220

17 The survey results are remarkable because this modestly sized survey easily
 18 detected 27 postal customers who were unaware of the early collections on eves of
 19 holidays in December 2001. In contrast, my survey identified only three customers

1 who were aware of the early collections. The Postal Service's communications
2 strategy indisputably is failing to reach all postal customers.

3 In developing my sample, I was hindered by the Postal Service's illegal
4 defiance of Commission Order No. 1331. Without the CBMS database, I could not
5 be certain whether particular cities even had collection boxes with normal collection
6 times later than the collection time announced for the eves of the holidays.
7 Therefore, to ensure that I asked true and accurate questions, I generally tried to
8 exclude non-city-delivery offices and smaller city-delivery offices whose level of
9 normal collection services was unknown to me. I usually assumed that a city with
10 more than one ZIP Code for street addresses was large enough to have normal
11 collection times later than the time announced for the eves of the holidays.

12 The exact text used in the surveys appears in Appendix 7.

13 **9. How the Postal Service *Should* Respond When Notice Is Not**
14 **Sufficient**

15 Perhaps the most-troubling aspect of the early collections on eves of holidays
16 is that the Postal Service cannot possibly believe that the minimal efforts that most
17 districts make to notify the public are actually reaching most of their customers, yet
18 the Postal Service proceeds with the early collections anyway. The tiny public notice
19 buried in the classified section of the *Daily News* in July 2000 suggests, sadly, that
20 the Postal Service views notice to the public as a mechanical, technical obligation.
21 Under the Postal Service's view, the Postal Service can discharge this obligation
22 with a public notice in one newspaper and declare the public notified. In December
23 2001, the Postal Service apparently considered two press releases in New York to
24 constitute sufficient notice, even if the media did not publicize the information in the
25 press release. The Postal Service saw no reason to inform customers at other
26 places where the Postal Service regularly has contact with postal customers, such
27 as post offices. The Postal Service also saw no need to inform postal clerks in
28 Manhattan or the people who provide customer service by telephone.

1 If I were a postal manager who wanted to perform early collections on eves of
2 holidays, and if I believed that I needed to *inform customers before making early*
3 *collections*, I might issue press releases as a part of my communications plan.
4 However, I would then monitor the extent to which media outlets actually publicized
5 the information. *Press releases are worthless for disseminating information* if the
6 media does not publish the information contained therein. If my press releases did
7 not generate publicity sufficient to inform customers, I would discard my plan for
8 *early collections*.

9 As a parallel example, suppose a person who lives at the end of a lonely
10 country road wishes to hold a garage sale on a Saturday. Suppose, further, that the
11 only practical way for this person to publicize the garage sale is to place an
12 advertisement in the local newspaper on Friday and Saturday. Now suppose that
13 the local newspaper fails to publish the advertisement on Friday or Saturday. Is this
14 person likely to sit in his garage all day and hold the garage sale anyway? I doubt it.

15 The same principle should apply to early collections on eves of holidays. If
16 the information is not reaching the public, the Postal Service should abandon the
17 plans for early collections. Unfortunately, the same principle does not, in practice,
18 seem to apply. Instead, issuing a press release apparently is sufficient notice in the
19 minds of many postal managers, and the importance of proceeding with the plans
20 apparently outweighs the risk of harm to the public.

21 **E. Early Collections Harm Customers**

22 As I explained in section VIII.B., the Postal Service fails to meet the needs of
23 customers when it *performs early collections on eves of holidays*. When the Postal
24 Service fails to meet customers' needs for collections, the Postal Service harms
25 customers. This harm exists regardless of whether customers are aware of the
26 Postal Service's *plans for early collections*. Even when customers are aware of the
27 early collections and have other options available, they must endure an
28 inconvenience to deposit their mail by travelling to a different post office or even a
29 *different city*. However, the harm obviously is much greater when customers are not

1 aware of the early collections and deposit their mail anyway. Their mail then sits in
2 the collection box for two to three days. Business and personal correspondence is
3 delayed, and customers suffer financial harm when bill payments are delivered late.
4 These delays in collection are particularly unfortunate because they may compound
5 other significant delays related to holiday mail volume. In addition, if the Postal
6 Inspection Service is correct in warning customers against leaving mail in collection
7 boxes overnight because of the risk of identity theft and other monetary loss, the
8 early collections also put customers at risk of crime.

9 Few reasonable people would dispute that delays in the collection and
10 postmark of mail harm customers. In fact, I can speak from personal experience.
11 When I went to college in Berkeley in 1986, I was disappointed to discover a virtual
12 epidemic of missed collections in Berkeley, particularly on Saturdays and Sundays.
13 On numerous occasions, my mail was delayed one day. However, I recall one day,
14 Saturday, September 13, 1986, when I deposited several letters for a collection on
15 Saturday afternoon. The Postal Service failed to make the Saturday collection or the
16 Sunday collection from the collection boxes located in front of the Sather Gate
17 Station, so my mail, including my test mail, was not postmarked until Monday. Over
18 the years, I have experienced collection delays for bank deposits, personal
19 correspondence, and sweepstakes entries for which the postmark date was
20 important. The particular delays that I experienced were not the result of early
21 collections on eves of holidays; rather, they were a consequence of poor service and
22 a postmaster who was uncommitted to resolving, or unable to resolve, the problems
23 despite my numerous letters to him. Nonetheless, I experienced delays of a type
24 similar to the delays that customers experience when they are unaware of early
25 collections on eves of holidays and they deposit their mail in good-faith reliance on
26 the collection schedules posted on collection boxes. Fortunately, the delays that I
27 experienced personally usually were one-day or two-day delays, whereas early
28 collections on eves of holidays may lead to three-day delays, plus additional delays
29 from holiday mail volume.

1 As I explained in Part 1 of my testimony, the Postal Service's service
2 standards for First-Class Mail are based in part on customer need. In addition, the
3 service standards presume a need to deliver customers' mail in one to three days.
4 When the Postal Service performs early collections and denies customers timely
5 collection and processing of their mail, the Postal Service fails to satisfy the
6 customer need that the Postal Service presumes in its service standards.

7 As I explained in section VIII.B., postmark dates are important to many
8 customers. December 31 postmarks have consequences for taxes and college
9 applications. Customers suffer when they deposit mail in collection boxes on New
10 Year's Eve, in reliance on the time posted on the collection boxes, only to have their
11 mail sit in the collection box for two or three days and receive a postmark in January
12 of the new year.

13 The Postal Service itself acknowledges the harm to customers when
14 customers' mail is not collected according to the schedule posted on collection
15 boxes. A so-called "zero bundle" may occur when a bundle of test mail deposited in
16 routine External First-Class Measurement System (EXFC) testing is not collected
17 and postmarked on the day of deposit. Response to DFC/USPS-42(d). Zero
18 bundles harm customers because most or all the mail fails to be delivered according
19 to the one-day, two-day, and three-day service standards applicable to that mail.
20 See Response to DFC/USPS-42(b) and (c). Compared to a zero bundle in EXFC
21 testing, if customers deposit their mail prior to the collection time posted on a
22 collection box, and if they are harmed when their mail is not collected and processed
23 on the day of deposit, their harm is no less severe or significant if it occurs on the
24 eve of a holiday as a result of a deliberate Postal Service decision to perform early
25 collections and a failure of the Postal Service to provide sufficient notice to
26 customers. In fact, the harm from early collections on eves of holidays is likely to be
27 greater than the harm caused by a typical missed collection detected by EXFC
28 because the early collection on the eve of a holiday precedes a holiday on which no
29 outgoing mail service is provided. Thus, the typical weekday EXFC "zero bundle"
30 results in a one-day delivery delay, while the typical early collection on the eve of a

1 holiday causes a two-day or even a three-day delay because of the absence of
2 collections and mail processing on holidays. Additional delays due to holiday mail
3 volume also are not unlikely.

4 The sufficiency of the notice to the public about early collections affects the
5 extent of the harm. *If most customers are not aware of the early collections, they*
6 *are more likely to deposit mail after the early collection time but before the time*
7 *posted on the collection box in the full expectation that the mail will be collected and*
8 *processed on the day of deposit. For example, postal customers in Manhattan*
9 *would be far more likely to deposit mail at 2:00 PM on Christmas Eve with the*
10 *expectation that the mail would be collected and processed on Christmas Eve if they*
11 *believed that the 5:00 PM collection time posted on the collection box applied, rather*
12 *than the earlier 8:30 AM or 1:00 PM collection time (or, in the case of mail chutes, no*
13 *collection time at all).*

14 The number of hours between the early collection time and the normal
15 scheduled collection time also provides some estimate of the likelihood that
16 customers either were not able to deposit their mail or deposited mail that sat in the
17 box for several days before it was collected.

18 The Postal Service illegally defied Commission Order No. 1331 and declined
19 to provide Collection Box Management System (CBMS) data that would have
20 allowed me to analyze the full extent of the early collections. The data provided in
21 the response to DFC/USPS-19 indicate that, as a result of the early collections, the
22 final scheduled collection time on the eves of holidays in 1998, 1999, and 2000 was
23 several hours earlier than normal. *I am unable to draw as many conclusions from*
24 *these data as I would have preferred because I have not viewed the underlying data.*
25 *For example, a particularly large quantity of boxes with normal early-afternoon*
26 *collection times in one district might cause the average to understate the effect of*
27 *the early collections on boxes that have late-afternoon collections. Averages are not*
28 *always the best way to describe data; without seeing the underlying data, I am*
29 *unable to state whether the averages accurately reflect the effect of the early*

1 collections. In some instances, the averages are likely to understate the effect of the
2 early collections.

3 Some collection boxes have no scheduled Saturday collection. When
4 districts perform collections on a weekday eve of a holiday according to the Saturday
5 collection schedule, collection boxes with no Saturday collection time presumably
6 are not collected. Even if some are collected, the relatively few postal customers
7 who happen to hear announcements of the changes in collection schedules
8 presumably would not use those collection boxes. By withholding CBMS data, the
9 Postal Service has prevented me from counting the number of collection boxes in
10 each district that are scheduled for no Saturday collection and factoring this
11 information into my analysis.

12 The data selectively provided by the Postal Service in response to
13 DFC/USPS-19 do not include detailed collection times information for the New York
14 District, which uses a Saturday collection schedule on some eves of holidays. I
15 know from personal experience that almost all Saturday collection times in
16 Manhattan are at 1:00 PM or earlier. In fact, many Saturday collection times in
17 Manhattan are earlier than 1:00 PM, in direct violation of the minimum national
18 service standards for collections prescribed in Chapter 3 of the *Postal Operations*
19 *Manual*. The Postal Service admits that some collection boxes in Manhattan have
20 Saturday collection times earlier than the times that the POM requires. See
21 Response to DFC/USPS-71. In addition, the collection boxes at the bottom of many
22 mail chutes in office buildings have no Saturday collection at all, a violation of Postal
23 Service policy if the boxes are accessible on Saturdays. By withholding CBMS data,
24 the Postal Service has deliberately denied me access to data necessary for my
25 evaluation of the issues in this proceeding and the development of my testimony.

26 Some postal managers appear to recognize the potential harm to customers
27 of early collections. In response to an inquiry from headquarters about possible
28 early collections on Monday, July 3, 2000, an e-mail message in USPS-LR-C2001-
29 1/4 stated, "The Midwest Area clusters UNANIMOUSLY decided to stick with normal

1 collection activities. We didn't want to take any chances by advancing collection
2 schedules." Perhaps the Midwest Area was concerned that the Postal Service
3 would be unable to provide sufficient notice to the public of early collections. Or
4 perhaps the Midwest Area was concerned that early collections would not meet the
5 needs of customers. In fact, it is hard to imagine a risk that the Midwest Area was
6 concerned about that does not support my contention that early collections on eves
7 of holidays harm customers. If more postal managers — particularly those in the
8 New York Metro Area and Northeast Area — shared the concern of managers in the
9 Midwest Area, early collections on eves of holidays would not be a major problem
10 affecting millions of postal customers.

11 **F. Postal Service Justifications for Early Collections Are Unpersuasive**

12 The Postal Service suggests that early collections on eves of holidays are
13 *appropriate and justified*.

14 The Postal Service states that mail volume on eves of holidays is low. The
15 Postal Service provided no quantifiable data in support of this position. Moreover,
16 the Postal Service failed to establish that customers who seek to deposit mail on
17 eves of holidays after the time established for the early collections do not need
18 collection service after this early collection time. The absence of any specific
19 information on this point is particularly troubling. It suggests that the decision to
20 perform early collections is made for the convenience of the Postal Service, not the
21 needs and convenience of customers.

22 In fact, most Postal Service justifications for early collections on eves of
23 holidays reflect the convenience of the Postal Service. The Postal Service uses
24 early collections on eves of holidays to save work hours. Early collections surely do
25 save some work hours. However, another option exists that would allow the Postal
26 Service to scale back collections in consideration of the lower-than-normal volume
27 while still honoring the normal final collection times posted on collection boxes. In
28 many cities, all collections are performed by dedicated collection routes, rather than
29 letter carriers when they encounter the collection boxes on their routes. Moreover,

1 high-volume collection boxes typically have at least two collections per day, often
2 one in the morning or early afternoon and another in the late afternoon. Due to
3 lighter-than-normal volume on eves of holidays, the Postal Service could omit the
4 early collection(s) from high-volume boxes and perform only the final collection. For
5 some boxes that have a final collection in the morning, if convenient, the Postal
6 Service could even perform this morning collection during the afternoon collection
7 run. Surely the Postal Service could schedule collection staff for fewer hours than
8 normal by compressing the collections into a late-afternoon time period rather than a
9 morning or early-afternoon time period. This schedule change would prevent harm
10 to customers. The late arrival of the mail to the processing plant would not pose a
11 problem because, if collection volume on eves of holidays truly is light, the plant
12 would be able to handle the volume without a problem.

13 The Postal Service also cites concerns about employee morale. Apparently
14 the Postal Service sees a need to release employees early on eves of holidays so
15 that they can spend time with their families. I do not discount the importance of
16 allowing employees to spend time with their families. However, postal employees
17 perform an essential service, and their need to spend time with their families must
18 be weighed against the public's need for this essential monopoly service and the
19 harm that may result when this service is not provided.

20 I also believe that the problem of employee morale on eves of holidays is a
21 problem of the Postal Service's own making. In my work experience, employees
22 may expect to be released from work early when they have been released early in
23 the past. In other words, the practice of releasing employees early from work in the
24 past creates an expectation that may lead to a morale problem if, in a subsequent
25 year, they are not released early. But the seed of this expectation is planted by
26 decisions in the past to send them home early. The Postal Service has not cited any
27 morale problems concerning adherence to normal collection schedules in the many
28 districts that observe normal collection schedules on eves of holidays. Employee
29 morale may be a justification for continuing early collections on eves of holidays only
30 to the extent that the Postal Service unwisely and improperly created these

1 expectations in the first place. However, even the errors of the past do not justify
2 continuing the harm to customers that results from early collections on eves of
3 holidays.

4 The Postal Service tried to justify early collections in Manhattan and Bronx on
5 Monday, July 3, 2000, by stating that streets below Canal Street were closed.
6 Response to DFC/USPS-35. This argument is unpersuasive. First, the closure of
7 streets below Canal Street would not have affected all of Manhattan Island to an
8 extent that would have prevented collections by a motorized route. The majority of
9 collection points in Manhattan are located above Canal Street. Second, the closure
10 of the streets south of Canal Street would not have affected collection activities in
11 Bronx, which is located north of Manhattan Island. Third, if streets below Canal
12 Street were closed, it is not clear how the Postal Service was able to make
13 collections according to the Saturday schedule. The street closure seemingly would
14 have disrupted all collection activities, yet the Saturday collections still were feasible.
15 Fourth, it is not clear why the Postal Service could not have used walking routes or
16 even the subway to collect mail. After all, the General Post Office in New York
17 sports the motto that "neither snow nor rain nor heat nor gloom of night stays these
18 couriers from the swift completion of their appointed rounds." If mail volume was as
19 low as it would have needed to have been for the Postal Service to have made a
20 straight-faced attempt to justify early collections, walking routes would have done a
21 fine job. I believe that where there is a will, there is a way. As an example, an e-
22 mail message provided in USPS/LR-C2001-1/4 from Lexington, Kentucky,
23 concerning plans for Monday, July 3, 2000, states,

24 The collection folks have figured out a way to get the boxes picked up. Since
25 the streets will be open part of the time we believe we can get them even
26 though it will cause the collector to have to park about a block away on 4-5
27 boxes and walk. The remaining boxes can be worked in between opening
28 and closing of the various streets.

29 Postal officials in Lexington wanted to make the collections, while postal officials in
30 New York, even on streets located miles away from the closed streets in a different
31 borough, did not. Fifth, if only collections below Canal Street would truly have been
32 disrupted, it is not clear why the Postal Service could not have posted signs on this

1 subset of boxes that were affected and restricted the curtailment to this area. Post
2 offices in most cities hosting parades or other special events curtail services at the
3 affected boxes only. See USPS-LR-C2001-1/1. While I do not believe that posting
4 a sign on every collection box informing customers of early collections is an undue
5 burden, I certainly do not believe that posting notices on a modest subset of the
6 boxes is an undue burden, either.

7 **G. Practices in Other Parts of the Country**

8 Perhaps the most-compelling evidence against the value of early collections
9 on eves of holidays resides in the fact that the majority of districts does not perform
10 early collections on eves of holidays. Fortunately, early collections appear to be
11 restricted to a minority of districts. I am concerned, of course, about the effects of
12 early collections on customers who deposit mail in these districts. However, most
13 districts apparently have identified one or more reasons not to pursue early
14 collections on eves of holidays. Perhaps the cost savings are minimal compared to
15 the disruption and harm to the public. Postal Service arguments about the value of
16 early collections on eves of holiday are unpersuasive because, if these practices
17 were of sufficient value to the agency to outweigh the harm to the public, why do
18 most districts *not* perform early collections on eves of holidays? And why does
19 headquarters policy almost always require normal collections on eves of holidays?⁴
20 Headquarters policy and the actual practice of the majority of districts should call into
21 question the practices of the rogue districts.

22 It also is noteworthy that some districts vary their practice from year to year.
23 If the benefits of this practice were large enough to justify harm to the public, one
24 would think that these districts would perform early collections year after year.

⁴ As explained in section VIII.A., headquarters policy permitted early collections on two days only: Christmas Eve in 1999 and Monday, July 3, 2000. On Christmas Eve in 1999, headquarters policy allowed only "late evening" collections to be eliminated. The only district that performed early collections on Christmas Eve in 1999 that nevertheless complied with headquarters policy was the Northern Virginia District, which ended collections at 7:00 PM.

1 **IX. HOLIDAY COLLECTION TIMES**

2 Postal Service policy prohibits posting of holiday collection times on collection
3 boxes unless the mail will be collected and processed on every holiday. Response
4 to DFC/USPS-3. Data provided in USPS-LR-C2001-1/2 suggest that no processing
5 and distribution center except, perhaps, the Milwaukee P&DC processes outgoing
6 mail on every holiday. Therefore, only collection boxes in the service area of the
7 Milwaukee P&DC should show holiday collection times. According to the response
8 to DFC/USPS-19, 11 collection boxes located in Milwaukee show holiday collection
9 times.

10 Even though holiday collection times may be justified on a maximum of 11 of
11 the collection boxes nationwide that show holiday collection times, in reality 4,005
12 other collection boxes nationwide mislead customers by showing a holiday
13 collection. Particularly large clusters of holiday collections appear in the Des Moines
14 IA 503 area, the Fox Valley IL 605 area, the Bloomington IL 617 area, the San
15 Francisco CA area (940 and 941), the North Bay CA 949 area, and Hawaii (967 and
16 968).

17 The Postal Service illegally defied Commission Order No. 1331 and declined
18 to provide Collection Box Management System (CBMS) data that would have
19 allowed me to analyze the holiday collection times. For example, the effect of the
20 large numbers of collection boxes showing holiday collection times in the 940 ZIP
21 Code area would be different if the 199 boxes were concentrated in one or two cities
22 versus every post office in every city in the 940 ZIP Code area. In the first instance,
23 the Postal Service might be misleading customers in a few cities, while in the second
24 instance the Postal Service would be misleading customers in the heavily populated
25 Peninsula between San Francisco and San Jose, prompting customers to make
26 worthless special trips to post offices to deposit mail on holidays.

27 Customers' need for accurate information on holiday collection times is not
28 trivial. In Appendix 8, I have provided a newspaper article that reveals that more
29 than 80 percent of businesses are open on at least one postal holiday, Martin Luther

1 King, Jr.'s Birthday. When businesses are open, they generate mail; when they
2 generate mail, they need accurate information about holiday collection practices.
3 Unfortunately, the Postal Service does not provide accurate information to the public
4 about holiday collection services.

APPENDIX 1

August 17, 2001

MANAGERS, OPERATIONS SUPPORT (AREA)

SUBJECT: Operations Policy for the 2001 Christmas and New Year's Holidays

This memorandum provides operating policy guidelines for holiday planning for the 2001 Christmas Holiday season.

Saturday, December 22, 2001, and Saturday, December 29, 2001: Normal processing, delivery, collection, and retail services will be provided. All delivery units should take the necessary actions prior to ensure that units are in a current status. Delivery should be attempted on available/incoming Priority parcels, perishable parcels, and other parcels containing obvious gifts. Delivery units with "left notice" packages of these types should again attempt delivery prior to Sunday, December 23, to ensure that the units are as "clean" as possible going into Monday, Christmas Eve.

Sunday, December 23, 2001 and Sunday, December 30, 2001: Retail services will be normal Sunday operations. There will be no outgoing processing and no scheduled collections other than those necessary to prevent boxes from overflowing; this includes boxes located on major roadways, other known heavily used boxes (business and residential), those located in front of main post offices, stations and branches, and major facilities. Each office must evaluate the service needs of their communities and determine what level of service is warranted.

Monday, December 24, 2001 (Christmas Eve) and Monday, December 31, 2001 (New Year's Eve): Retail services will be normal Monday operations with reduced staffing in the afternoon. Normal delivery collections and outgoing operations will be provided. Express Mail services will be based on the Saturday network.

Christmas Day and New Year's Day "Widely Observed," Tuesday, December 25, 2001 and Tuesday, January 1, 2002: There will be no delivery (Express Mail service only in locations where we normally deliver on Sunday), no retail activities, and no outgoing processing. There will be no scheduled collections other than those necessary to prevent boxes from overflowing; this includes boxes located on major roadways, other known heavily used boxes (business and residential), those located in front of main post offices, stations and branches, and major postal facilities. Each office must evaluate the service needs of their communities and determine what level of service is warranted.

Drop ship mailers will require appointments on New Year's Day, January 1, 2001. Staffing should be scheduled accordingly in order to honor our commitments to the mailing industry during this holiday period.

Wednesday, December 26, 2001 and Wednesday, January 2, 2002: Return to normal service levels. Offices may wish to perform additional collection sweeps earlier in the day to advance mail to plants if volumes warrant.

All offices should carefully review staffing plans for these holidays and make adjustments as necessary to ensure that the service needs of their communities are attained with no service disruptions.

The recommended last day for deposit of Priority Mail as well as Express Mail for delivery by Christmas is:

Local Overnight Area

Express and Priority Mail: Saturday, December 22

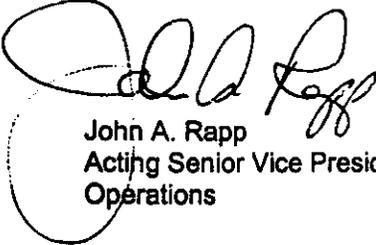
Non-Local Area

Express Mail: Friday, December 21

Priority Mail: Thursday, December 20

Managers must be aware of the impact of our new shared air transportation network. Special attention should be directed to scheduled day and night turn operations immediately preceding the holidays as noted below:

Friday, December 21/28	Day Turn Operations	Yes
	Night Turn Operations	Yes
Saturday, December 22/29	Day Turn Operations	Yes
	Night Turn Operations	No
Sunday, December 23/30	Day Turn Operations	Yes
	Night Turn Operations	No
Monday, December 24/31	Day Turn Operations	No
	Night Turn Operations	Yes
Tuesday, December 25/ January 1, 2002	Day Turn Operations	No
	Night Turn Operations	No



John A. Rapp
Acting Senior Vice President
Operations

cc: Mr. Barranca
Ms. Gibert
Ms. Smith
Mr. Vogel
Acting Vice President, Delivery

APPENDIX 2

APPENDIX 2 — SUMMARY OF EARLY COLLECTIONS ON EVES OF HOLIDAYS

District	3-Digit ZIP Code	Saturday 12-22-01	Monday 12-24-01	Saturday 12-29-01	Monday 12-31-01	Saturday 12-23-00	Saturday 12-30-00	Monday 7-3-00	Friday 12-24-99	Friday 12-31-99	Thursday 12-24-98	Thursday 12-31-98	Tuesday 12-24-96
Caribbean	006		Saturday		Saturday								
Caribbean	007		Saturday		Saturday								
Caribbean	008		Saturday		Saturday								
Caribbean	009		Saturday		Saturday								
Middlesex-Central	014		Noon						Noon		Noon		
Middlesex-Central	015		Noon						Noon		Noon		
Middlesex-Central	016		Noon						Noon		Noon		
Middlesex-Central	017		Noon						Noon		Noon		
Middlesex-Central	018		Noon						Noon		Noon		
Middlesex-Central	019		Noon						Noon		Noon		
SE New England	020		Noon						Noon		Noon		
Boston	021				1:00 PM				2:00 PM	4:00 PM	1:00 PM	4:00 PM	
Boston	022								2:00 PM	4:00 PM	2:00 PM	4:00 PM	
SE New England	023								Noon		1:00 PM		
Boston	024		Noon		1:00 PM				2:00 PM	4:00 PM	2:00 PM	4:00 PM	
SE New England	025		Noon						Noon		1:00 PM		
SE New England	026		Noon						Noon		1:00 PM		
SE New England	027		Noon						Noon		1:00 PM		
SE New England	028		Noon						Noon		1:00 PM		
SE New England	029		Noon						Noon		1:00 PM		
SE New England	02903		Noon		Noon				Noon	Noon	1:00 PM	1:00 PM	
Connecticut	060		Noon						Noon		1:00 PM		
Connecticut	061		Noon						Noon		1:00 PM		
Connecticut	062		Noon						Noon		1:00 PM		
Connecticut	063		Noon						Noon		1:00 PM		
Connecticut	064		Noon						Noon		1:00 PM		
Connecticut	065		Noon						Noon		1:00 PM		
Connecticut	066		Noon						Noon		1:00 PM		
Connecticut	067		Noon						Noon		1:00 PM		
Connecticut	068		Noon						Noon		1:00 PM		
Connecticut	069		Noon						Noon		1:00 PM		
Northern New Jersey	070		2:00 PM		2:00 PM				1:00 PM				
Northern New Jersey	071		2:00 PM		2:00 PM				1:00 PM				
Northern New Jersey	072		2:00 PM		2:00 PM				1:00 PM				
Northern New Jersey	073		2:00 PM		2:00 PM				1:00 PM				
Northern New Jersey	074		2:00 PM		2:00 PM				1:00 PM				
Northern New Jersey	075		2:00 PM		2:00 PM				1:00 PM				

APPENDIX 2 — SUMMARY OF EARLY COLLECTIONS ON EVES OF HOLIDAYS

District	3-Digit ZIP Code	Saturday 12-22-01	Monday 12-24-01	Saturday 12-29-01	Monday 12-31-01	Saturday 12-23-00	Saturday 12-30-00	Monday 7-3-00	Friday 12-24-99	Friday 12-31-99	Thursday 12-24-98	Thursday 12-31-98	Tuesday 12-24-96
Northern New Jersey	076		2:00 PM		2:00 PM				1:00 PM				
Central New Jersey	077		Saturday		Saturday				11:00 AM				
Central New Jersey	078		Saturday		Saturday				11:00 AM				
Central New Jersey	079		Saturday		Saturday				11:00 AM				
South Jersey	080					Weekday							
South Jersey	081					Weekday							
South Jersey	082					Weekday							
South Jersey	083					Weekday							
South Jersey	084					Weekday							
Central New Jersey	085		Saturday		Saturday				11:00 AM				
Central New Jersey	086		Saturday		Saturday				11:00 AM				
Central New Jersey	087		Saturday		Saturday				11:00 AM				
Central New Jersey	088		Saturday		Saturday				11:00 AM				
Central New Jersey	089		Saturday		Saturday				11:00 AM				
New York	100		Saturday		Saturday			Saturday					
New York	101		Saturday		Saturday			Saturday					
New York	102		Saturday		Saturday			Saturday					
Triboro	103		Saturday		Saturday			Saturday					
New York	104		Saturday		Saturday			Saturday					
Westchester	105		Saturday		Saturday			Saturday					
Westchester	106		Saturday		Saturday			Saturday					
Westchester	107		Saturday		Saturday			Saturday					
Westchester	108		Saturday		Saturday			Saturday					
Westchester	109		Saturday		Saturday			Saturday					
Triboro	110		Saturday		Saturday			Saturday				Saturday	Saturday
Triboro	111		Saturday		Saturday			Saturday				Saturday	Saturday
Triboro	112		Saturday		Saturday			Saturday				Saturday	Saturday
Triboro	113		Saturday		Saturday			Saturday				Saturday	Saturday
Triboro	114		Saturday		Saturday			Saturday				Saturday	Saturday
Triboro	115		1:00 PM		1:00 PM			Saturday	1:00 PM			Saturday	Saturday
Long Island	116		Saturday		Saturday			Saturday				Saturday	Saturday
Long Island	117		1:00 PM		1:00 PM			Saturday	1:00 PM			Saturday	Saturday
Long Island	118		1:00 PM		1:00 PM			Saturday	1:00 PM			Saturday	Saturday
Long Island	119		1:00 PM		1:00 PM			Saturday	1:00 PM			Saturday	Saturday
Albany	120		Noon		Noon			Noon	Noon			Noon	Noon
Albany	121		Noon		Noon			Noon	Noon			Noon	Noon
Albany	122		Noon		Noon			Noon	Noon			Noon	Noon

APPENDIX 2 — SUMMARY OF EARLY COLLECTIONS ON EVES OF HOLIDAYS

District	3-Digit ZIP Code	Saturday 12-22-01	Monday 12-24-01	Saturday 12-29-01	Monday 12-31-01	Saturday 12-23-00	Saturday 12-30-00	Monday 7-3-00	Friday 12-24-99	Friday 12-31-99	Thursday 12-24-98	Thursday 12-31-98	Tuesday 12-24-96
Albany	123		Noon						Noon		Noon		
Westchester	124		Saturday		Saturday								
Westchester	125		Saturday		Saturday								
Westchester	126		Saturday		Saturday								
Westchester	127		Saturday		Saturday								
Albany	128		Noon						Noon		Noon		
Albany	130		Noon						Noon		Noon		
Albany	131		Noon						Noon		Noon		
Albany	132		Noon						Noon		Noon		
Albany	135		Noon						Noon		Noon		
Albany	139		Noon						Noon		Noon		
Western New York	140								Noon	Noon			
Western New York	141								Noon	Noon			
Western New York	142								Noon	Noon			
Western New York	143								Noon	Noon			
Western New York	144								Noon	Noon			
Western New York	145								Noon	Noon			
Western New York	146								Noon	Noon			
Western New York	147								Noon	Noon			
Western New York	148								Noon	Noon			
Western New York	149								Noon	Noon			
South Jersey	197					Weekday							
South Jersey	198					Weekday							
South Jersey	199					Weekday							
Capital Metro	200								Noon		Saturday		
Northern Virginia	201								7:00 PM		Saturday		
Capital Metro	206								Noon		Saturday		
Capital Metro	207								Noon		Saturday		
Capital Metro	208								Noon		Saturday		
Capital Metro	209								Noon		Saturday		
Baltimore	210								Saturday		Saturday		
Baltimore	211								Saturday		Saturday		
Baltimore	212								Saturday		Saturday		
Baltimore	214								Saturday		Saturday		
Baltimore	217								Saturday		Saturday		
Baltimore	219								Saturday		Saturday		
Northern Virginia	220								7:00 PM		Saturday		

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Northern Virginia	221									Saturday		
Northern Virginia	222							7:00 PM		Saturday		
Northern Virginia	223							7:00 PM		Saturday		
Appalachian	240	Noon	Noon	Noon	Noon	Noon	Noon	Noon	Noon			
Appalachian	241	Noon	Noon	Noon	Noon	Noon	Noon	Noon	Noon			
Appalachian	250	Noon	Noon	Noon	Noon	Noon	Noon	Noon	Noon			
Appalachian	251	Noon	Noon	Noon	Noon	Noon	Noon	Noon	Noon			
Appalachian	252	Noon	Noon	Noon	Noon	Noon	Noon	Noon	Noon			
Appalachian	253	Noon	Noon	Noon	Noon	Noon	Noon	Noon	Noon			
Appalachian	263	Noon	Noon	Noon	Noon	Noon	Noon	Noon	Noon			
Appalachian	264	Noon	Noon	Noon	Noon	Noon	Noon	Noon	Noon			
Appalachian	265	Noon	Noon	Noon	Noon	Noon	Noon	Noon	Noon			
Atlanta	300											
Atlanta	301							3:00 PM				
Atlanta	302							3:00 PM				
Atlanta	303							3:00 PM				
Central Florida	327		Noon		Noon							
Central Florida	328		Noon		Noon							
Central Florida	329		Noon		Noon							
Central Florida	334		Noon		Noon							
Central Florida	347		Noon		Noon							
Central Florida	349		Noon		Noon							
Royal Oak MI	480					Noon		Noon	Noon			
Detroit	481									4:00 PM		
Detroit	482									4:00 PM		
Royal Oak MI	483							Noon	Noon			
Royal Oak MI	484					Noon		Noon	Noon			
Royal Oak MI	485					Noon		Noon	Noon			
Detroit	492					Noon		Noon	Noon			
Northland	563							Noon		4:00 PM		
Dakotas	570											
Dakotas	571							2 hrs early		2 hrs early		
Dakotas	573							2 hrs early		2 hrs early		
Dakotas	581							2 hrs early		2 hrs early		
Central Illinois	614		Noon		Noon							
Central Illinois	615		Noon		Noon							
Houston	770									Noon		

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Houston	772										Noon		
Houston	773										Noon		
Houston	774										Noon		
Houston	775										Noon		
Houston	776										Noon		
Houston	777										Noon		
Houston	778										Noon		
Rio Grande	782								1:00 PM		1:00 PM	1:00 PM	
Rio Grande	784								Noon		2:00 PM		
Rio Grande	76531								Noon				
Rio Grande	78852										1 hr early	1 hr early	
Colorado/Wyoming	800								1:00 PM				
Colorado/Wyoming	801								1:00 PM				
Colorado/Wyoming	802								1:00 PM				
Colorado/Wyoming	803								1:00 PM				
Colorado/Wyoming	804								1:00 PM				
Colorado/Wyoming	805								1:00 PM				
Colorado/Wyoming	806								1:00 PM				
Colorado/Wyoming	807								1:00 PM				
Colorado/Wyoming	808								1:00 PM				
Colorado/Wyoming	809								1:00 PM				
Colorado/Wyoming	810								1:00 PM				
Colorado/Wyoming	811								1:00 PM				
Colorado/Wyoming	812								1:00 PM				
Colorado/Wyoming	813								1:00 PM				
Colorado/Wyoming	814								1:00 PM				
Colorado/Wyoming	815								1:00 PM				
Colorado/Wyoming	816								1:00 PM				
Colorado/Wyoming	820								1:00 PM				
Colorado/Wyoming	821								1:00 PM				
Colorado/Wyoming	822								1:00 PM				
Colorado/Wyoming	823								1:00 PM				
Colorado/Wyoming	824								1:00 PM				
Colorado/Wyoming	825								1:00 PM				
Colorado/Wyoming	826								1:00 PM				
Colorado/Wyoming	827								1:00 PM				
Colorado/Wyoming	828								1:00 PM				

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Colorado/Wyoming	829								1:00 PM				
Colorado/Wyoming	830								1:00 PM				
Colorado/Wyoming	831								1:00 PM				
Spokane	832								Noon				
Spokane	833								Noon				
Spokane	834								Noon				
Spokane	835								Noon				
Spokane	836								Noon				
Spokane	837								Noon				
Spokane	838								Noon				
Salt Lake City	840								NONE				NONE
Salt Lake City	841								NONE				NONE
Salt Lake City	842								NONE				NONE
Salt Lake City	843								NONE				NONE
Salt Lake City	844								NONE				NONE
Salt Lake City	845								NONE				NONE
Salt Lake City	846								NONE				NONE
Salt Lake City	847								NONE				NONE
Phoenix	850												
Phoenix	852												
Phoenix	853												
Tucson	856										NONE		NONE
Tucson	857										NONE		NONE
Las Vegas	890								1:00 PM				
Las Vegas	891								1:00 PM				
Las Vegas	895								1:00 PM				
Seattle	980								1:00 PM				
Seattle	981								1:00 PM				
Seattle	982								1:00 PM				
Seattle	983								1:00 PM				
Seattle	984								1:00 PM				
Seattle	985								1:00 PM				
Seattle	988								1:00 PM				
Seattle	989								1:00 PM				
Spokane	990								Noon				
Spokane	991								Noon				
Spokane	992								Noon				

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Spokane	993								Noon				
Spokane	994								Noon				
Total Districts - Early Collections		1	14	1	11	2	2	1	22	5	15	3	0
Total Districts - No Collections or Processing		0	0	0	0	0	0	0	1	0	1	0	3

NOTES

Information for years prior to 1999 may not be complete.

The district totals do not count instances of early collections in a single city or ZIP Code in the district.

For Phoenix, Tucson, and Salt Lake City, "NONE" means that the Postal Service did not collect or process any outgoing mail on the eve of a holiday.

For South Jersey, "Weekday" means that the district performed collections according to a weekday schedule, rather than a Saturday schedule.

APPENDIX 3

POSTAL NEWS

December 12, 2001

For more information
Contact: Pam Meehan-Smith
608-246-1282

FOR IMMEDIATE RELEASE

MAIL SERVICES SET CHRISTMAS DAY- EARLY POST OFFICE CLOSINGS ON CHRISTMAS EVE & NEW YEARS EVE

(December 12, 2001) - The Madison Post Office will operate on a holiday schedule on Christmas Day, Tuesday, December 25, 2001. Madison Postmaster Kim Mayo said regular residential and business deliveries will not be made, and usual post office lobby services will not be available.

On Christmas Eve all Madison Post Offices, including Middleton and Verona, will close their retail windows at 2:00 PM. Administrative offices at the Main Post Office on Milwaukee Street will also close early. However, all other services including mail delivery, collection box and parcel pick-up, will be provided on Monday, December 24, 2001 during our regular hours of operation.

On New Years Eve, Madison, Middleton and Verona Post Offices, as well as all administrative offices, will close at 2:00 pm with the exception of the Main Post Office and Westside Station retail units. The Main Post Office and Westside Station will maintain regular retail hours. **Customers wishing to have their tax payments hand-postmarked on December 31st are advised to mail early or observe early closing hours.**

Special Delivery and Express Mail service will continue during the holiday. There will be no mail pick-up from collection boxes on Christmas Day or New Year's Day.

POSTAL NEWS

December 27, 2001

For more information
Contact: Pam Meehan-Smith
608-246-1282

FOR IMMEDIATE RELEASE

EARLY POST OFFICE CLOSINGS ON NEW YEAR'S EVE

(Madison, WI) - The Madison Post Office will operate on a holiday schedule on New Year's Day, Tuesday, January 1, 2002. Madison Postmaster Kim Mayo said "Regular residential and business deliveries will not be made, and usual post office lobby services will not be available".

On New Year's Eve, Madison, Middleton and Verona Post Offices, as well as all administrative offices, will close at 2:00 pm with the exception of the Main Post Office and Westside Station retail units. The Main Post Office and Westside Station will maintain regular retail hours. **Customers wishing to have their tax payments hand-postmarked on December 31st are advised to mail early or observe early closing hours.**

Express Mail service will continue during the holiday. There will be no mail pick-up from collection boxes on New Year's Day.

-30-

APPENDIX 4



POSTAL NEWS

FOR IMMEDIATE RELEASE
December 7, 2001

Contact: Carl Walton
973-693-5115

POSTAL SERVICE ON SATURDAY SCHEDULES FOR CHRISTMAS, NEW YEARS EVES

EDISON - The Postal Service's Central New Jersey District Office announced today that, on December 24, 2001, and December 31, 2001, all retail operations and finance units will operate on a Saturday schedule.

In addition, also on Christmas and New Years Eve, all collection mailboxes in ZIP Code areas of 077, 078, 079, 085, 086, 087, 088, and 089 will have the mail collected on a Saturday collection schedule. Please make note of these important changes and plan your mailing activities accordingly.

Full postal window service and mail delivery, as well as regular mailbox collections will resume on Wednesday, December 26, 2001, and on Wednesday, January 2, 2002.

Thank you for your understanding and cooperation. Have a happy and safe Holiday Season!

APPENDIX 5



Happy Holidays!



Connecticut Post Offices

Holiday Service on December 24th

As part of our special holiday collection service, mail deposited in postal collection boxes will be picked up for the last time at noon on December 24th.

Most Post Offices will be open for retail as late as 5 p.m. on the 24th. For further information, please contact your local Post Office.



UNITED STATES
POSTAL SERVICE®

APPENDIX 6

Florida
OLANDO 1997 Buick Wildcat 4.9L V6, 100,000 miles, 100K mi. Call 312-222-1111.
OLANDO 1997 Buick Wildcat 4.9L V6, 100,000 miles, 100K mi. Call 312-222-1111.

Automotive
OLANDO 1997 Buick Wildcat 4.9L V6, 100,000 miles, 100K mi. Call 312-222-1111.

Miscellaneous
5000-5210

Lost & Found
5001

Public Notices
5003

Automotive
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NEW YORK CITY HOUSING AUTHORITY

NYCHA Agency Plan 2001

In accordance with Section 5A of the Housing Act of 1957 as amended, the New York City Housing Authority (NYCHA) has developed a draft agency plan for the year 2001. The draft plan was developed following several weeks of consultation with the 41 members of the citywide Resident Advisory Board.

Availability of Plans for Public Inspection
 The public is advised that the proposed plans will be available for public inspection from June 30, 2000 through and including August 17, 2000, at the following locations:

- At NYCHA's website, which can be located at www.nycha.org
- At the Management Office of each NYCHA public housing development
- At NYCHA's principal office located at 120 Broadway, 12th Floor, Rockefeller Plaza, New York, New York, between the hours of 9:30 AM to 4:30 PM

At the Community Centers listed below during the hours of 9:00 AM to 7:30 PM:

Campos Plaza Community Center 811 East 13th Street New York, New York	Moore Community Center 515 Jackson Avenue Brooklyn, New York	Atlantic Eastern Community Center 501 Carlton Avenue Brooklyn, New York
Manhattan Community Center 330 West 133rd Street New York, New York	Sheff Community Center 133-36 Roosevelt Avenue Flushing, New York	Brooklyn Community Center 715 East 109th Street Brooklyn, New York
Can Hill Road Community Center 744 East Can Hill Road New York, New York	Armenian/Bulgarian Community Center 37-40 Beach Channel Drive Far Rockaway, New York	West Brighton Community Center 230 Broadway Staten Island, New York

Public Comments
 NYCHA will hold public comment on the proposed plans in a public hearing to be held on Thursday, August 17, 2000, from 5:00 PM to 8:30 PM at:

Broadway East Thomas Jefferson High School 600 Broadway Ave at Decatur Ave Brooklyn, New York	Stuyvesant Stuyvesant High School 1000 Avenue East at East 17th Street at Avenue M Brooklyn, New York	Brooklyn South Edward B. Morgan High School 1600 Avenue East at East 17th Street at Avenue M Brooklyn, New York
Brown South Lincoln Hospital Flat Floor Administration 19th Street and Park Avenue Brooklyn, New York	Manhattan North City College Aaron Davis Hall 153rd St. at Columbus Ave New York, New York	Manhattan West New York Technical College Kilgus Academic Building 101 Warren Street Staten Island, New York
Queens Excelsior Industries Center 17-23 Queens Blvd at Avenue J Flushing, New York	The Manhattan Hotel 233 Adams Street Between Penn and Tiffany Streets Brooklyn, New York	

Each location listed above is both handicapped accessible and can be reached using public transportation. Written comments regarding the draft plan are encouraged. To be considered, submissions must be received and filed with NYCHA on or before August 17, 2000. Comments should be sent through the internet address set out above or via ordinary mail (all submissions will be accepted) to the address set forth below:

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 1 Bug
 8 Diversion
 15 Praise
 16 Footstool
 17 Pasta
 18 Preference
 19 Weep
 20 Author of "The Thin Red Line"
 22 Old salt
 23 Concerts
 25 Break of
 26 Kind of palm
 27 "Peanuts" character
 29 Blank reply
 30 Chopms
 31 Bouquarts
 33 Revolutions
 35
 36 Bouquins, Paris
 37 Effort
 38 Having ability
 42 PR for consumption

DOWN
 3 Deep-voiced singer
 4 Threshold
 7 Tyle
 9 Blow mover
 10 Fats Waller song
 11 "Mishever"
 13 Playful
 15 Sicilian
 16 volcanic peak
 18 substance
 19 Garden structures
 21 With N
 24 Hard rubber
 26 Island country near Florida
 28 Everywhere
 29 Last B.C. era
 30 Bar customers?
 36 Maroon
 37 Sneaky
 38 maffiosa?
 39 Fluffy
 40 Resisting

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APPENDIX 7

APPENDIX 7 — SURVEY TEXT

STANDARD INTRODUCTION

POSTAL SERVICE SURVEY

In response to a service complaint that I filed, the Postal Rate Commission in Washington is examining the Postal Service's practice of collecting mail from blue collection boxes on the eves of some holidays prior to the collection time posted on each collection box.

Later this spring, the commission will review information that I submit evaluating the Postal Service's success in notifying the public of plans for early collections. To gain additional insight, I decided to conduct this random survey.

I would appreciate if you would provide valuable input into the commission's deliberations by taking a moment to answer the question on the postage-paid reply card. When you are finished, kindly detach the reply card and deposit it in the mail by **April 13, 2002**. Your response will be anonymous.

Thank you very much for your time and assistance.

DISTRICT-SPECIFIC SURVEY QUESTIONS

Albany District

On Christmas Eve last year (Monday, December 24, 2001), were you aware that the U.S. Postal Service performed the final collections of mail from blue collection boxes in your city at **noon or earlier**, even if a normal weekday collection time later than noon was posted on the collection boxes?

Appalachian District

On the following dates, were you aware that the U.S. Postal Service performed the final collection of mail from blue collection boxes in your city at **noon or earlier**, even if a collection time later than noon was posted on the collection boxes?

Saturday, December 22, 2001

Monday, December 24, 2001 (Christmas Eve)

Saturday, December 29, 2001

Monday, December 31, 2001 (New Year's Eve)

APPENDIX 7 — SURVEY TEXT

Boston District

On New Year's Eve last year (Monday, December 31, 2001), were you aware that the U.S. Postal Service performed the final collections of mail from blue collection boxes in your city at **1:00 PM or earlier**, even if a normal weekday collection time later than 1:00 PM was posted on the collection boxes?

Central Florida District

On Christmas Eve and New Year's Eve last year (Monday, December 24, 2001, and Monday, December 31, 2001), were you aware that the U.S. Postal Service performed the final collections of mail from blue collection boxes in your city at **noon or earlier**, even if a normal weekday collection time later than noon was posted on the collection boxes?

Central Illinois District

On Christmas Eve and New Year's Eve last year (Monday, December 24, 2001, and Monday, December 31, 2001), were you aware that the U.S. Postal Service performed the final collections of mail from blue collection boxes in your city at **noon or earlier**, even if a normal weekday collection time later than noon was posted on the collection boxes?

Central New Jersey District

On Christmas Eve and New Year's Eve last year (Monday, December 24, 2001, and Monday, December 31, 2001), were you aware that the U.S. Postal Service performed the final collection of mail from blue collection boxes in your city according to the **Saturday schedule** posted on the boxes, even if a normal weekday collection time later than the Saturday collection time was posted on the collection boxes?

Connecticut District

On Christmas Eve last year (Monday, December 24, 2001), were you aware that the U.S. Postal Service performed the final collections of mail from blue collection boxes in Connecticut at **noon or earlier**, even if a normal weekday collection time later than noon was posted on the collection boxes?

Long Island District

On Christmas Eve and New Year's Eve last year (Monday, December 24, 2001, and Monday, December 31, 2001), were you aware that the U.S. Postal Service performed the final collection of mail from blue collection boxes on Long

APPENDIX 7 — SURVEY TEXT

Island at **1:00 PM**, even if a weekday collection time later than 1:00 PM was posted on the collection boxes?

Middlesex-Central District

On Christmas Eve last year (Monday, December 24, 2001), were you aware that the U.S. Postal Service performed the final collections of mail from blue street collection boxes in your city at **noon or earlier**, even if a normal weekday collection time later than noon was posted on the collection boxes?

New York District

On Christmas Eve and New Year's Eve last year (Monday, December 24, 2001, and Monday, December 31, 2001), were you aware that the U.S. Postal Service performed the final collection of mail from blue collection boxes in New York City according to the **Saturday schedule** posted on the boxes, even if a normal weekday collection time later than the Saturday collection time was posted on the collection boxes?

Southeast New England District

On Christmas Eve last year (Monday, December 24, 2001), were you aware that the U.S. Postal Service performed the final collections of mail from blue collection boxes in your city at **noon or earlier**, even if a normal weekday collection time later than noon was posted on the collection boxes?

Triboro District

On Christmas Eve and New Year's Eve last year (Monday, December 24, 2001, and Monday, December 31, 2001), were you aware that the U.S. Postal Service performed the final collection of mail from blue collection boxes in New York City according to the **Saturday schedule** posted on the boxes, even if a normal weekday collection time later than the Saturday collection time was posted on the collection boxes?

Westchester District

On Christmas Eve and New Year's Eve last year (Monday, December 24, 2001, and Monday, December 31, 2001), were you aware that the U.S. Postal Service performed the final collection of mail from blue collection boxes in your city according to the **Saturday schedule** posted on the boxes, even if a normal weekday collection time later than the Saturday collection time was posted on the collection boxes?

APPENDIX 8

Most businesses stay open for King holiday

CIVIL RIGHTS LEADERS UPSET BY LIMITED OBSERVANCE

By Deborah Kong
Associated Press

While post offices, many schools and the New York Stock Exchange will close for the Martin Luther King Jr. holiday Monday, it will be business as usual for most companies.

Just a quarter of workplaces offer a paid holiday Monday, according to a survey of 448 employers by the Bureau of National Affairs, a Washington-based publishing company that researches business trends.

Civil rights leaders say they are disappointed the holiday has not been more widely adopted by companies.

"The numbers are still embarrassing and disappointing, primarily because the Martin Luther King holiday came after so much struggle," said Mary Frances Berry, chair of the U.S. Commission on Civil Rights. "It's disappointing that people do not realize it's a chance to sit down and reflect and think about social-justice issues."

Kweisi Mfume, president of the National Association for the Advancement of Colored People, recalls the 15-year battle to persuade lawmakers to recognize King's birthday as a federal holiday.

Beginning in the 1970s, he joined hundreds of others, and then thousands, including Diana Ross, Stevie Wonder and U.S. Rep. John Conyers, shivering through an annual protest march that ended at the steps of the nation's Capitol each Jan. 15 — King's birthday in 1929.

In 1983, President Ronald Reagan signed a law making King's birthday a national holiday. It was first celebrated nationwide in January 1986.

In the next two decades, states slowly — and in some cases reluctantly — followed. All 50 states now observe the King holiday, said Robert Vickers of the King Center in Atlanta.

Monday, 83 percent of government organizations and 76



ASSOCIATED PRESS ARCHIVES

Activists struggled for decades to honor slain civil rights leader Martin Luther King Jr., shown delivering his "I Have a Dream" speech in 1963, with a holiday.

LOCAL CLOSINGS

Many federal operations, including schools, will be closed Monday for Martin Luther King Day. **PAGE 7B**

percent of schools will grant a paid holiday for King's birthday, according to the survey. But only about 10 percent of manufacturers, stores, hospitals and communications companies scheduled a paid holiday, the survey found.

The survey's findings are based on public and private employers' responses to a mailed questionnaire.

"There's a tremendous double-speak from some in the corporate community," Mfume said. "The juxtaposition is to say, 'We support diversity,' and then at the same time say, 'But by the way, we are not going to celebrate Dr. King's birthday.'"

Many companies may not observe the holiday for financial reasons, or because King was a controversial figure, businesses and King scholars say.

"Because King toward the end of his life was talking a lot about the injustice he thought

was built into the American capitalist system, he was not a poster boy for American business," said Vincent G. Harding, author of "Martin Luther King: The Inconvenient Hero."

At Hawthorn Physician Services in St. Louis, it would cost \$8,000 to give 100 employees the day off, said Lisa Williams, its human-resources director.

The company observes six holidays, and the King holiday is not among them. "It's annoying because my kids have it off for school," Williams said. "If we had more benefits, that would probably be one of the many I'd like to add."

Watkins Motor Lines, a Florida-based company with about 10,000 employees, also does not observe the holiday. "We're a conservative company, and so we probably have more of a comfort level in just sticking to the traditional days," said Billie Sue Toepfer, a personnel supervisor in Cincinnati.

There are exceptions, mostly at banks and large companies. Anheuser-Busch, for example, has been granting employees a paid day off on the King holiday for 16 years. MetLife started giving its 39,000 U.S. workers a paid holiday two years ago.

Clayborne Carson, a history professor and director of the Martin Luther King Jr. Papers Project at Stanford University, says he believes that a day off is not the most important issue.

"With any holiday, if you get a three-day ski weekend, why does that have significance with respect to honoring Martin Luther King?" Carson said. "I'm hoping that we can find ways of celebrating the holiday that have meaning."

IF YOU'RE INTERESTED

More information is available in the Internet.

Bureau of National Affairs:

www.bna.com

King Papers Project:

www.stanford.edu/group/King

The King Center:

www.thekingcenter.org

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required parties in accordance with section 12 of the *Rules of Practice*.



DOUGLAS F. CARLSON

April 23, 2002
Santa Cruz, California