

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

EXPERIMENTAL PRIORITY MAIL FLAT-RATE  
Box, 2004

Docket No. MC2004-2

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS DANIEL J. BARRETT  
TO OCA INTERROGATORY (OCA/USPS-T2-2-7)  
(July 6, 2004)

The United States Postal Service hereby files the response of witness Daniel J. Barrett to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T2-2-7, filed on June 22, 2004.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF POSTAL SERVICE WITNESS BARRETT  
TO OCA INTERROGATORIES

OCA/USPS-T2-2. At pages 7-8 of your testimony, you state:

These items must be entered at the post office, or may be picked up by a Postal Service letter carrier from the home or place of business if the customer is a 'known mailer' and the return address on the package matches the location of pick-up.

- a. Has the Postal Service published any official rules or regulations (e.g., in the Federal Register) defining which individuals are "known mailers" and which are not? If so, please provide the date and location of publication.
- b. Has the Postal Service published any guidelines in the Postal Operations Manual on how to determine whether an individual is a "known mailer"? If so, please provide a publication date and cite for this information. Also, provide a copy of the new material.
- c. Has the Postal Service circulated any internal memoranda to retail offices and carrier offices defining or describing who is a "known mailer"? If so, please provide a copy of such memoranda, the author's name and position, the date the memoranda were circulated, and the locations where the memoranda were circulated.
- d. Are there restrictions against mailers who are not "known" from entering mail at a postal retail counter? If so, what are these restrictions.
- e. Must an individual who enters Priority Mail at a retail counter show personal identification before the mailpiece will be accepted? Please explain.

**Response:**

[a] I am informed that the term "known mailer" does not apply to aviation security, instead having application to International mail. In an effort to avoid confusion, the language "sender known to the postal carrier" is used to refer to domestic mail. I am told a definition of this term has not been published.

[b] Please see my response to [a] concerning use of the term "known mailer." After discussion with security officials of the Postal Service, I am informed that no such guidelines have been published in the POM.

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**OCA/USPS-T2-2, response (Continued):**

[c] Please see my response to [a] concerning use of the term “known mailer.” After discussion with security officials of the Postal Service, I am informed that no such internal memoranda were disseminated.

[d] I am informed that, per DMM E010, the sender, “known” or otherwise, may be required to provide identification before the mail is accepted by the USPS. Further, the Retail associate would inquire of the sender whether the package contains liquid, fragile, perishable, or potentially hazardous materials. The Retail associate may refuse to accept any package the customer cannot deem safe. If the package is hazardous, it would be refused regardless of whether or not the sender is known.

[e] Please see my response to [d] above. I am informed that the Postal Service has the option to ask for identification, though it is not standard practice at this time.

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OCA/USPS-T2-3. Please confirm that the Postal Service has launched a program to install self-service package mailing centers at many postal retail facilities.

- a. What is the name of this program and what is the name for such centers?
- b. Will it be possible for mailers who are not “known” to postal employees to mail Priority Mail packages at such centers?
- c. Will it be necessary for mailers at the self-service centers to show personal identification?
- d. Please relate how extensive the placement of these self-service package centers will be, e.g., will every retail facility have one? If not, what percentage of postal facilities are planned to have such self-service centers?

**Response:** Confirmed

[a] Automated Postal Center (APC)

[b] Any mailer using an APC will need to provide identifying information. Payment is required by credit card, and the sender is photographed during the transaction.

[c] See my response to [b].

[d] Not every retail facility will have an APC. The Postal Service currently has a planned roll-out of over 2500 units for placement within its highest traffic locations. This is approximately 7% of all Post Offices.

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OCA/USPS-T2-4. At page 8 of your testimony you state that:

While the Flat-Rate Box offers convenience as described in my testimony, it will be subject to the same security guidelines that apply to the mailing of other Priority Mail packages.

Please describe in detail the security guidelines that apply to the mailing of other Priority Mail packages. Also explain how these guidelines will be applied to the mailing of Priority Mail Flat-Rate packages.

**Response:**

I am informed that the guidelines in place were contained in the attached revision to the Domestic Mail Manual, published in Postal Bulletin 21930 on 10-10-96. The Flat Rate Box will be subject to the same guidelines, applied in the same fashion as with other Priority Mail packages.

# Domestic Mail

## DMM REVISION

### Mailing Restrictions for Domestic Packages Weighing 16 Ounces or More

Effective August 16, 1996, *Domestic Mail Manual* (DMM) D100.2.1 and D100.2.3 are revised and DMM D100.2.6 is added to reflect restrictions on the mailing of single-piece rate Priority Mail packages weighing 16 ounces or more that are paid with adhesive stamps. Also effective August 16, 1996, DMM E010.1.7 is added to reflect restrictions on the mailing of all single-piece rate packages weighing 16 ounces or more that are addressed to overseas military installations, regardless of postage payment method.

On September 27, 1995, the Postal Service published a final rule in the *Federal Register* announcing restrictions on the mailing of packages weighing 16 ounces or more to international and APO/FPO destinations (60 FR 49755-49758). These restrictions were promulgated to enhance airline security measures and to protect the traveling public, postal employees, and postal contractors who transport U.S. mail. The Postal Service developed these changes in package collection procedures in consultation with the Federal Aviation Administration (FAA).

The Postal Service has now determined, for the same reasons, to extend similar restrictions to packages that are deposited into collection receptacles and mailed to domestic addresses. These added provisions will affect only First-Class/Priority Mail packages weighing 16 ounces or more that bear postage stamps and that are mailed from domestic addresses. These restrictions do not affect Express Mail, Periodicals (former second-class mail), or Standard Mail (B) (former fourth-class mail) at any weight up to the maximum of 70 pounds; any item weighing less than 16 ounces; and any package, regardless of weight, for which postage is paid with a postage meter or a permit imprint.

Under the revised standards set forth below, domestic First-Class/Priority Mail packages bearing postage stamps and weighing 16 ounces or more may not be deposited into collection receptacles, including street, lobby, and apartment boxes, or left in rural mailboxes. Instead, these packages must be presented by the sender at a post office, station, or branch. A sender known to a Postal Service delivery employee may also give such packages to a city, rural, or highway contract letter carrier.

Any affected package weighing 16 ounces or more that requires air transportation and that is deposited into a collection receptacle will be returned to the sender with a note ask-

ing the sender to present the package personally at the local post office or to a city, rural, or highway contract letter carrier if the sender is known to the carrier. Postage on an item improperly deposited into a collection receptacle may be used when the item is remailed at the post office. A sender who does not wish to re-mail a returned item may apply for a postage refund for the item at any post office. Any piece without a return address will be sent to a Postal Service mail recovery center to determine the identity of the sender for appropriate return.

#### *Domestic Mail Manual* (DMM)

#### D Deposit, Collection, and Delivery

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#### D100 First-Class Mail

\* \* \* \* \*

#### 2.0 MAIL DEPOSIT

[Revise 2.1 and 2.3 and add new 2.6 to read as follows:]

##### 2.1 Single-Piece and Card Rates

Single-piece rate and card rate First-Class Mail, and single-piece rate Priority Mail weighing less than 16 ounces, may be deposited into any collection box, mailchute, or mail receptacle or at any place where mail is accepted if the full required postage is paid with adhesive stamps. Metered mail must be deposited in locations under the jurisdiction of the licensing post office, except as permitted under P030. Permit imprint mail must be presented at a post office under P040 or P700.

\* \* \* \* \*

##### 2.3 Zoned Rate Priority Mail

Unless restricted by 2.6, pickup service for Priority Mail is available under D010. Single-piece rate Priority Mail paid with adhesive stamps and weighing 16 ounces or more must be presented at a post office retail counter or handed to a postal carrier as prescribed by 2.6. Metered mail must be deposited in locations under the jurisdiction of the licensing post office, except as permitted under P030. Permit imprint mail must be presented at a post office under P040 or P700.

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OCA/USPS-T2-5. At page 7 of your testimony you state that Priority Mail Flat-Rate packages “may be picked up by a Postal Service letter carrier from the home or place of business.” Please state whether the following pickup methods will be available for Priority Mail Flat-Rate packages:

- a. Free Carrier Pickup for “Requests . . . received by 2:00 AM CST.” See <https://carrierpickup.usps.com/cgi-bin/WebObjects/CarrierPickup.woa> and <http://www.usps.com/pickup/>
- b. Pickup on Demand. See <http://pickup.usps.com/pickup/>
- c. Are there any other pickup options besides those listed parts a. and b. of this interrogatory?
  - i. If so, please explain what the other pickup options are.
  - ii. Is there a name for this option? If so, please state the name.
- d. Please confirm that the Postal Service charges \$12.50 for Pickup on Demand (cited in part b. of this interrogatory), but that no charge is imposed for Carrier Pickup (cited in part a. of this interrogatory). If you do not confirm, explain why not.
- e. With respect to zone/pound-rated Priority Mail, what types of postage checks do carriers make under the free Carrier Pickup service?
- f. With respect to zone/pound-rated Priority Mail, what types of postage checks do carriers make under the Pickup on Demand service?
- g. Describe generally where and how postage checks are made for zone/pound-rated Priority Mail that is picked up by a carrier. In this description, state the role (if any) of postal clerks.

**Response:**

[a] This internet-based notification service will be available to Priority Mail Flat Rate Box users on the same basis as all other Priority Mail users. There currently are some locations which lack the capability to implement this notification service.

[b] Yes, in some locations.

[c] Yes.

[i] Pickup during the normal carrier delivery route without prior notification.

[ii] I am unaware of any special name other than that used in [i].

[d] Confirmed

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**OCA/USPS-T2-5, response (Continued):**

[e]-[f] It is my understanding that carriers are expected to verify that postage has been applied, but are not expected to verify that the correct amount has been applied.

[g] It is my understanding that supervisors are responsible for ensuring postage verification. Postal clerks do not have a specific role, unless directed to do so by supervisors.

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OCA/USPS-T2-6. Please confirm that free Carrier Pickup, requested online at <https://carrierpickup.usps.com/cgi-bin/WebObjects/CarrierPickup.woa>, was launched on Sunday, February 1, 2004, in selected locations.

- a. If you cannot confirm, please state any additional facts that would make the statement correct.
- b. Also, please provide a copy of the Postal Service's public and internal announcements of the new pickup service.
- c. Please state whether the free Carrier Pickup service cited above is available in all ZIP codes across the nation. If not, which ZIP codes cannot use this service?
- d. If some ZIP codes are excluded from participation, what are the criteria for inclusion/exclusion?
- e. Please confirm that the Carrier Pickup service cited above was not available at the time that Docket No. R2001-1 was filed by the Postal Service with the Postal Rate Commission. If you cannot confirm, please explain why not.
- f. Please confirm that the Postal Service indicated nowhere in its filings in Docket No. R2001-1 that the Carrier Pickup service cited above would be available at a future date. If you do not confirm, provide cites to the Postal Service's Docket No. R2001-1 filing that refer to the new Carrier Pickup service.
- g. Please confirm that, in its Docket No. R2001-1 filing, the Postal Service did not explicitly account for the differences in cost that might arise from the Carrier Pickup service cited above. If you do not confirm, provide cites to all documents filed by the Postal Service in Docket No. R2001-1 that explicitly account for the Carrier Pickup service costs.
- h. Prior to implementation of the free Carrier Pickup service cited above, what methods of entry into the postal system for Priority Mail packages, by means of postal carriers, were available to mailers? If free Carrier Pickup is not available in all ZIP codes, then are the methods noted in the preceding sentence those that are (and will be) available during the period of the Flat-Rate Box experiment for ZIP codes not participating in free Carrier Pickup? Please explain.

**Response:**

Not quite. Postal Service carriers have collected mail along their routes for as long as there have been carriers. However, the "Carrier Pickup" service at issue in your question is a web interface that enables mailers to alert their carrier of an anticipated collection via the internet. This internet-based notification service was first tested in November of 2003.

[a] See above.

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**OCA/USPS-T2-6, response (Continued):**

[b] Objection filed.

[c] "Carrier Pickup" (with internet-based notification) is not currently available in all ZIP Codes.

[d] It is my understanding that not all post offices have the technological infrastructure to implement internet-based notification at this time.

[e] Carrier pickup has always been available at the time of delivery. The online notification tool was not available at the time that Docket No. R2001-1 was filed by the Postal Service with the Postal Rate Commission.

[f] Objection filed.

[g] Objection filed.

[h] See my response to Interrogatory OCA/USPS-T2-5[c], above.

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OCA/USPS-T2-7. Please describe in detail how the Postal Service will inform mailers of the most advantageous rate available to them for Priority Mail boxes. Specifically, how will the Postal Service publicize that zone/pound-rated Priority Mail is cheaper for all 1- and 2-pound packages, and that it is cheaper for lower zones in the 3 – 7 pound tiers?

**Response:**

Please see my response to DBP/USPS-T2-18[a].

RESPONSE OF POSTAL SERVICE WITNESS BARRETT  
TO OCA INTERROGATORY

**CERTIFICATE OF SERVICE**

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

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