

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

POSTAL RATE AND FEE CHANGES  
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

RESPONSES OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID B. POPKIN  
(DBP/USPS-144-146, 148)

The United States Postal Service hereby provides its responses to the following interrogatories of David B. Popkin, filed on June 7, 2005: DBP/USPS-144-146, and 148. A partial objection to DBP/USPS-145 and a full objection to DBP/USPS-147 were filed on June 17, 2005.

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

Respectfully submitted,

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By its attorneys:

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Response of the United States Postal Service  
to Interrogatory of David B. Popkin

**DBP/USPS-144.** Please refer to your response to DFC/USPS-32. [a] Please confirm, or explain if you are unable to confirm, that your response means that for every failure of a return receipt to be properly completed in accordance with the various requirements of the USPS manuals, it would be as the result of the "carelessness" and/or "inattentiveness" of a single USPS employee to follow the requirements rather than as the result of a deliberate action. [b] Please confirm, or explain if you are unable to confirm, that your response means that there are no agreements, understandings, or procedures that exist at any post office in the country, including, but not specifically limited to IRS and state tax offices, government agencies in Washington DC as well as the field, and other large recipients of accountable mail, that allow for completion of the return receipt card in a manor which is not provided for in the Postal Service's regulations, such as, but not specifically limited to, being completed by the addressee after the control of the mail has been transferred from the Postal Service to the addressee.

**RESPONSE:**

[a-b] Not confirmed. See the revised response to DFC/USPS-32, and the response to DBP/USPS-145.

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**DBP/USPS-145.** Please describe in detail the steps and processes that are involved in the delivery of the following types of mail from the time that it arrives at the delivery post office until the article has been delivered and all of the actions associated with the delivery are completed:

- [1] A mailpiece sent Certified Mail
- [2] A mailpiece sent Certified Mail with an Electronic Return Receipt
- [3] A mailpiece sent Certified Mail with a hardcopy Return Receipt [PS Form 3811]
- [4] A mailpiece with Delivery Confirmation sent to each of the following addresses:

- [a] A single mailpiece sent to a typical residential address in Englewood NJ or a similar sized post office.
- [b] Mail sent to Internal Revenue Service, Andover MA 05501.
- [c] Mail sent to Internal Revenue Service, Philadelphia PA 19255
- [d] Mail sent to Internal Revenue Service, Memphis TN 37501.
- [e] Mail sent to Internal Revenue Service, Atlanta GA 39901
- [f] Mail sent to Internal Revenue Service, Kansas City MO 64999
- [g] Mail sent to Internal Revenue Service, Austin TX 73301
- [h] Mail sent to Internal Revenue Service, Fresno CA 93888
- [i] Mail sent to government agencies in Washington DC ZIP Codes 202-205.

If different steps and processes are utilized with the IRS depending on whether it is during the tax season as opposed to not during the tax season or for any other reason, please describe all steps and processes and the condition under which they are utilized.

If different steps and processes are utilized with the Washington DC post office depending on the size or type of agency or for any other reason, please describe all steps and processes and the condition under which they are utilized.

Please indicate in each of your detailed explanations the point at which the control of the mailpiece is transferred from the Postal Service to the addressee,

**RESPONSE:**

Generally, the processing of Certified Mail and Certified Mail with an electronic return receipt is described in the Postal Operations Manual (POM), sections 813.2 and 813.3. For Certified Mail with a hard copy return receipt, also see POM 813.4. For Delivery Confirmation mail, see POM 816.2, 816.3, and 816.4.

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A single Certified Mail mailpiece sent to a typical residential address in Englewood NJ or a similar sized post office would be scanned at delivery, with the recipient's signature obtained on PS Form 3849. See POM 811.1. A single Delivery Confirmation piece would be scanned at delivery, with no signature obtained.

Similar procedures would apply if an IRS facility or other government agency received delivery of a single piece of Certified Mail or Delivery Confirmation mail. The piece would be scanned at delivery, and, for Certified Mail, the recipient's signature would be obtained on the PS Form 3849. A separate signature would be obtained on the hard copy return receipt, Form 3811, if there is one.

For larger deliveries to the IRS or other government agencies, up to 500 pieces of Certified Mail items are listed on PS Form 3883, Firm Delivery Sheet. The barcode on the sheet is scanned at delivery, and a signature (or stamp) is obtained on the Form 3849. The barcode from the Form 3883 is linked to the signature obtained on the Form 3849. In instances where return receipts (green cards) are requested, we have not gotten information from all the IRS facilities or government agencies, but have learned of two different approaches. The green cards may be stamped on the day of delivery (Procedure 1), or could be left with the IRS or other agency for signature at a later time (Procedure 2). Here is more detail about each procedure.

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Procedure 1

- Postal employees are domiciled at the IRS building full time to process accountable mail items sent to the IRS.
- At delivery, IRS employees remove the contents of the Certified Mail items and forward the envelope and green cards to the onsite postal employees.  
Note: the mail is not scanned as delivered until it is sent to the onsite postal employees.
- If applicable, a postal employee removes the green cards and feeds them through a machine that applies the IRS signature stamp.
- Postal employees scan the Certified Mail items as delivered and create Form 3883 for each 500 items scanned.
- Postal employees handstamp the IRS signature on Form 3849, and append the Form 3849 to the Form 3883.
- Green cards are bundled and returned to the General Mail Facility the same day for delivery and dispatch.

Procedure 2

- A red line is placed in the right corner of the Certified Mail items before the mail is taken to the IRS.
- The green cards are removed and bundled in a separate pile.
- At delivery, Form 3883, Firm Delivery Sheet is scanned (up to 500 pieces per sheet) and the IRS signature is obtained on PS Form 3849. One Form 3849 is used for each Form 3883.

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- The green cards are left with a designated IRS employee who notes the date of receipt at the top of the return receipt pile.
- The IRS runs the return receipts through a signature machine and returns the return receipts to the Postal Service, generally a few days later.

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**DBP/USPS-146.** For each of the seven Internal Revenue Service locations provided in DBP/USPS-145 subparts b through h and for each of the four types of mailpieces in [1] through [4], please provide volume data for a given year and some indication of the volume that is handled during the tax season as opposed to the remainder of the year.

**RESPONSE:**

The Postal Service does not have the requested volumes.

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**DBP/USPS-148.** Please refer to page ii of the USPS OIG Report Number DS-AR-00-001. It was suggested that management establish milestones using the planned information technology platform to capture and develop a comprehensive system for measuring all streams of First-Class Mail. What specific suggestions were made and have they been implemented in the current EXFC program? If not, why not?

**RESPONSE:**

The recommendation in the referenced OIG Report Number DS-AR-00-001 was:

[E]stablish milestones using the planned information technology platform to capture data and develop a comprehensive system for measuring all streams of First-Class Mail. OIG Report at ii and 9.

Management's response to this recommendation was:

The [USPS] Consumer Advocate will work with the vice president, Information Platform (IP) to develop a plan that will add enriched bar-coded mail streams to future IP testing methodologies. At this time, technology does not support a cost-effective method for tracking individual First-Class Mail pieces from the point of deposit to the point of delivery. OIG Report at 12.

The Postal Service provided the OIG with the following information to close this recommendation.

The effort to capture data of all streams of First-Class Mail is being addressed, in part through the Confirm program. Utilizing barcode technology, the Confirm service allows us to track shipments and mail flow through facilities, pinpoint problems and improve service. However, limited mailer participation and inconsistent use inhibit our ability to develop comprehensive measurement systems, and thus milestones, for all types of FCM. As stated in audit report number DA-AR-02-007, while Confirm provides important diagnostic information, it does not provide statistically reliable transit time measures. However, Management retains an open mind and continues to explore ways to capture data cost effectively and reliably measure all streams of FCM.

Based on this response, the OIG closed this recommendation on March 18, 2003.