

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268B0001

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

Docket No. R2005-1

INSTITUTIONAL RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID P. POPKIN
DBP/USPS-236-39
(July 19, 2005)

The United States Postal Service hereby provides its institutional responses to interrogatories of David B. Popkin: DBP/USPS-236-39, filed on July 5, 2005.

Each interrogatory is stated verbatim, followed by the response.

Respectfully submitted,
UNITED STATES POSTAL SERVICE

By its attorneys:

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INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID B. POPKIN

DBP/USPS-236. Please refer to your response to DBP/USPS-171 subpart d. Please confirm, or explain if you are unable to confirm, that when Confirm PLANET barcodes are utilized on EXFC mailing pieces they will be on outgoing mail.

RESPONSE:

Confirmed.

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TO INTERROGATORY OF DAVID B. POPKIN

- DBP/USPS-237.** Please refer to your response to DBP/USPS-171 subpart d.
- a. Do Confirm PLANET Barcodes that appear on EXFC mailpieces contain any data which indicates any part of the destination address or information that is related to the destination address or would allow for the determination of the destination address or any part of it or related to a given group of addresses (for example, a 9-digit Postnet Barcode would provide either a specific destination address or a group of addresses on a given "block-face" [or an] 11-digit Postnet Barcode would provide a specific address)?
 - b. If so, please explain.

RESPONSE:

PLANET barcodes on EXFC mail pieces do not reflect in any way a destination address, a range of destination addresses, or a piece of a destination address.

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- DBP/USPS-238.** Please refer to your response to DBP/USPS-171 subpart d.
- a. Please confirm, or explain if you are unable to confirm, that when Confirm PLANET barcodes are utilized on EXFC mailing pieces they are scanned during the processing of the mail and are maintained in a database.
 - b. Please confirm, or explain if you are unable to confirm, that when Confirm PLANET barcodes are utilized on EXFC mailing pieces that in addition to the scanning that occurs during the processing of the mail a scan is also made of the Postnet Barcode and that both are maintained in a database so that destination address data or information may [sic] be obtained from a scan of a Confirm PLANET Barcode.

RESPONSE:

EXFC mailpieces containing PLANET and POSTNET barcodes are scanned during mail processing. However, scan data for those pieces are excluded from the Confirm database. See also, the response to DBP/USPS-239.

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DBP/USPS-239. Please refer to your response to DBP/USPS-171 subparts d and e.

a. With respect to the EXFC testing program, please identify the USPS employees or categories of USPS employees [provide the number of employees in that category] that have access to the Confirm PLANET Barcode database which potentially could lead to the identity of reporters.

b. Please elaborate on the security employed to ensure that other USPS employees do not learn or have access to this information.

RESPONSE:

Scan data from EXFC mail pieces are excluded from the Confirm database. As such, it is not possible for mail processing employees, their supervisors, or anyone else in their chain of command including officers, to identify EXFC pieces using Confirm data. Similarly, the headquarters employees whose work touches EXFC also are unable to identify EXFC mail pieces from Confirm data. Data pertaining to EXFC pieces are routed exclusively to the EXFC contractor. The manager who supervised the creation of these EXFC arrangements in the last century (when the actual work was performed by an outside contractor) is no longer associated with the Confirm program. In sum, Confirm data do not provide a means for identifying EXFC mail pieces. Beyond the measures described above, the Postal Service employs standardized security protocols which themselves preclude making their nature publicly available.