



September 30, 2008

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SUBJECT: Audit Report – Political Campaign Mailings
(Report Number MS-AR-08-006)

This report presents the results of our self-initiated audit of Political Campaign Mailings (Project Number 07RG001MS000). Our objectives were to determine whether U.S. Postal Service officials:

- Recorded political campaign mailings in the political mail log before inducting the mailings into the mail stream.
- Notified mailers who deposited political mailings that may be too late for delivery by the election date, of the potential for late delivery, and documented the advice provided to them in the political mail log.
- Documented all political campaign mail inquiries and their resolution.

Click [here](#) to go to Appendix A for additional information about this audit.

Conclusion

Officials in the districts we reviewed did not always record political campaign mailings in the political mail log before inducting the mailings into the mail stream. In addition, officials maintained duplicate political campaign mail recordkeeping systems. Further, officials did not always notify mailers who deposited political campaign mailings that may be too late for delivery by the election date, of the potential for late delivery, and document the advice provided to them in the political mail log. Also, officials did not always document political campaign mail inquiries and their resolutions. These issues could result in refund of postage and negative publicity. We will report this non-monetary impact for goodwill/branding in our Semiannual Report to Congress. Finally,

the Postal Service may be subsidizing political candidates and committees by providing First-Class Mail® service for materials mailed at Standard Mail® rates.

Political Campaign Mail Recordkeeping Needs Improvement

Officials did not always record political campaign mailings in the political mail log before inducting the mailings into the mail stream. This occurred because although employees were aware of relevant policies and procedures for recording such mailings, they simply did not always comply with them, and there are no controls to identify the errors. As a result, the Postal Service may not have adequate records to resolve customer complaints, which could result in refund of postage and negative publicity.

In addition, officials maintained duplicate political campaign mail recordkeeping systems – an automated recordkeeping system contained in PostalOne! and a manual log. Information contained in the two systems did not always reconcile. This occurred because Headquarters Business Mail Acceptance officials initiated actions to automate the political mail recordkeeping process in PostalOne!, but did not coordinate their efforts with end users to properly implement the automated system and eliminate the manual process. As a result, the Postal Service is expending unnecessary labor costs to maintain these duplicate political campaign mail recordkeeping systems. Click [here](#) to go to Appendix B for our detailed analysis of this topic.

We recommend the Vice President, Business Mail Entry and Payment Technologies, coordinate with the Vice Presidents, Area Operations, to:

1. Consolidate the manual political mail log into the automated recordkeeping system in PostalOne! for all sites that have access to the PostalOne! system. Require sites that do not have access to the PostalOne! system to maintain the manual political mail log and transmit the political campaign mailing information to their respective Business Mail Entry Units to be entered into PostalOne!.
2. Program PostalOne! to require employees to identify political campaign mailings in the system.
3. Reinforce to employees the importance of recording political campaign mail information.

Management's Comments

Management disagreed with recommendation 1, asserting that PostalOne! was never designed to be a data collection and management system for political mail logs, and the manual log process, with certain revisions, is effective in ensuring enough information is obtained to deal with any customer issues that appear. Management disagreed with recommendation 2 because employees are already required to identify whether a mailing is political, and because our recommendation would increase costs with minimal

benefit. Management's calculations showed that using one second for each of 14 million mailings would add 38,000 workhours. Management agreed with our finding and recommendation 3 – to reinforce to employees the importance of recording political campaign mail information. Management will conduct communication awareness and training sessions particularly around campaign and election periods. They will add steps to their self-audits that include checking for political mail logs and validating postage statements are properly recorded in the PostalOne! System. Management plans to accomplish these actions by the end of 2008. Management's comments, in their entirety, are included in [Appendix C](#).

Evaluation of Management's Comments

We disagree with management's position on recommendation 1. As management's response to recommendation 4 notes, PostalOne!'s design includes comment fields, so there are no design limitations that make our recommendation impractical. We note that Business Mail Acceptance officials already started the process that we recommend; we simply suggest that management complete it. Management's assertion that a revised manual log process will be effective in ensuring enough information is obtained leaves in place the problem of duplicative processes. It will not be possible to determine whether Business Mail Entry managers and postmasters are complying with the requirement to record all political campaign mailings.

We also disagree with management's position on recommendation 2. Taking one second to identify political mailings in PostalOne! is much faster than logging the mailing manually (note that $14,000,000 \text{ seconds} \div 3,600 \text{ seconds/hour} = 3,889 \text{ hours}$, not 38,000 hours). The suggestion that because political campaign mailings are a small percentage of all mailings, employees would "without conscious effort" routinely indicate that mailings are not political, can be addressed by management's proposed action under recommendation 3, to conduct awareness and training sessions around campaign and election periods.

In conclusion, management's corrective actions will not resolve the issues identified in the report.

Mailings Deposited too Late for Delivery by the Election Date

Officials did not always notify mailers who deposited political mailings that may be too late for delivery by the election date, of the potential for late delivery, and document the advice provided to them in the political mail log. This occurred because Postal Service's guidance to employees regarding the handling of late deposited political mail is not consistent and specific. If officials do not notify mailers that their political campaign mailings may not be delivered by the election date, mailers may not have the opportunity to use alternate delivery methods such as handing out the campaign material to potential voters. Additionally, if officials do not document the advice provided to mailers, the Postal Service may not have adequate documentation to

resolve customer complaints, which could result in the refund of postage fees, negative publicity, and an adverse impact on the Postal Service brand. Click [here](#) to go to Appendix B for our detailed analysis of this topic.

We recommend the Vice President, Business Mail Entry and Payment Technologies, coordinate with the Vice Presidents, Area Operations, to:

4. Include a field in PostalOne! for employees to document the advice provided to mailers regarding late arriving political campaign mail, and revise the guidance in Handbook DM 109, *Business Mail Acceptance*, and the *Postal Operations Manual* to instruct the employees to use PostalOne! to document this advice.
5. Reinforce to employees the importance of advising mailers regarding late arriving political campaign mail.

Management's Comments

Management partially agreed with our finding and recommendation number 4. They did not see a need to include a field in PostalOne! for employees to document the advice provided to mailers regarding late arriving political campaign mail because the system already has a field where comments are captured. The postage statements also have a comments section located at the bottom of the statement where employees can enter any additional information relevant to the mailing. Management agreed to add a comment in the political mail section of Handbook DM 109 to provide employees guidance on how to document the advice provided to mailers regarding late arriving political campaign mailings. Management plans to accomplish this action by the end of 2008.

Management agreed with recommendation number 5. They will conduct communications and training awareness around election periods and include evaluation of this process in their self-audits. Management plans to accomplish these actions by the end of 2008.

Evaluation of Management's Comments

The U.S. Postal Service Office of Inspector General (OIG) considers management's comments responsive to recommendations 4 and 5. However, management should also revise the *Postal Operations Manual* (POM) to provide employees guidance on how to document the advice they provide to mailers regarding late arriving political campaign mailings. Management's corrective actions will resolve the issues identified in the report.

Political Campaign Mail Inquiries and their Resolution

Officials did not always document political campaign mail inquiries and their resolution because Postal Service policies in this area do not specify the officials responsible for accepting, processing, and documenting political mail inquiries, or provide guidance on the procedures to perform these functions. The Postal Service will not have adequate documentation to address customer complaints if officials do not document political campaign mail inquiries and their resolution. This could result in the refund of postage fees and negative publicity. Click [here](#) to go to Appendix B for our detailed analysis of this topic.

We recommend the Acting Senior Vice President, Operations, coordinate with the Vice Presidents, Area Operations, to:

6. Develop standard operating procedures for accepting, processing, and documenting political mail inquiries and their resolution. The standard operating procedures should clearly define areas of responsibility and provide a method for tracking political mail inquiries and their resolution.
7. Provide training for officials responsible for resolving political campaign mail complaints to make them aware of the requirements for handling political campaign mail inquiries and their resolution.

Management's Comments

Management agreed with recommendations 6 and 7, but indicated the responsibility rests with the Postal Service's Office of Consumer Advocate

Evaluation of Management's Comments

A cross-functional group of Postal Service officials including officials from Consumer Advocate, Delivery Operations, and Network Operations met to discuss recommendations 6 and 7. The group decided it was appropriate to address these recommendations to the Acting Senior Vice President, Operations. We believe this is a cross-functional issue and the Acting Senior Vice President, Operations, should coordinate with other responsible officials to resolve the issue. Consequently, management's corrective actions will not resolve the issues identified in the report.

Other Matters

The Postal Service may be subsidizing political candidates and committees by providing First-Class service for materials they mail at Standard Mail rates. During our field visits,

we found that Albuquerque, Maine, and Chicago Business Mail Entry Unit (BMEU)¹ employees expedite all political campaign mailings during processing and distribution. This practice results in employees providing First-Class service for political campaign materials mailed at Standard Mail rates.

Headquarters Pricing and Classification officials stated that Postal Service policy does not explicitly require employees to expedite all political campaign mailings. However, it is common practice for employees to expedite these mailings due to their sensitive nature.

Postal Service policies and procedures address the end to end service standards² for First-Class and Standard Mail. The end-to-end service standards for First-Class Mail and Standard Mail are 1 to 3 days and 3 to 10 days, respectively.

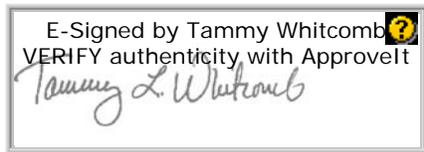
Because of the expedited handling that First-Class Mail receives, the Postal Service incurs higher costs than for Standard Mail, and consequently charges the customer higher prices. By treating Standard Mail as First-Class, the Postal Service may be forfeiting revenue. We were unable to determine the amount of revenue forgone because officials did not maintain records that document the level of service provided to mailers who mailed political campaign material at Standard Mail rates.

The OIG considers all the recommendations significant, and therefore requires OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. These recommendations should not be closed in the follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed. We view the disagreements on recommendations 1 and 2 as unresolved and plan to pursue them through the formal audit resolution process. Additionally, we plan to pursue the issues associated with the implementation of corrective actions to recommendations 6 and 7 through the formal audit resolution process.

¹ A BMEU is the area of a postal facility where mailers present bulk, presorted and permit mail for acceptance. The BMEU includes dedicated platform space, office space, and a staging area on the workroom floor.

² End-to-end service standards are day ranges for mail originating and destined for delivery within the 48 contiguous states and the District of Columbia.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Robert Mitchell, Director, Sales and Service, or me at (703) 248-2100.



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APPENDIX A: ADDITIONAL INFORMATION

BACKGROUND

The U.S. Postal Service plays a vital role in the American democratic process by ensuring political campaign material mailed by registered political candidates³ and political committees⁴ is delivered to voters as quickly as possible. Political campaign mail is material mailed at First-Class Mail or Standard Mail postage rates for political campaign purposes by a registered political candidate, campaign committee, or committee of a political party.⁵ Political campaign mail allows candidates and committees to use the mail for fundraising, recruiting volunteers, informing voters about key issues, and increasing voter turnout. The candidate's political party or campaign committee normally uses its address as the return address on the political campaign mailings. Federal or state law often requires political campaign mail to use the endorsement "Paid by [committee] and authorized by [candidate]."

Postal Service policy requires employees to record political campaign mail in the political mail log. BMEU managers and postmasters⁶ are required to maintain these records for 6 months. At a minimum, the mailing record must include:⁷

- The name of the mailer.
- A sample, photocopy, or description of the mailing.
- The date and time the mailing was received for dispatch or delivery.
- The election day deadline and, if applicable, the date of requested delivery.
- If applicable, the approximate number of pieces not delivered before the election day deadline and/or the date of requested delivery and the reasons why delivery was not timely.
- The approximate volume of any Standard Mail consigned to waste upon instruction by the mailer.

³ A registered political candidate is an individual or organization recognized as such by the appropriate governmental election control authority.

⁴ A combination of two or more individuals, including any political party governing body, whether state or local, making expenditures to support or oppose any candidate for public office or measure, but does not include a voter registration program.

⁵ An individual or organization recognized as such by the appropriate governmental election control authority is considered to be a registered political candidate or party. Qualified political committees are national or state committees of political parties, the Democratic Congressional or Senatorial Campaign Committee, and the National Republican Congressional or Senatorial Committee.

⁶ A postmaster is the manager in charge of a post office. A post office is the basic organizational unit of the U. S. Postal Service. Generally, each post office has primary responsibility for collection, delivery, and retail operations in a specific geographic area.

⁷ POM, Sections 492.51 and 492.53.

Officials expedite political campaign mailings because they are time sensitive. Mailers should attach Postal Service (PS) Tag 57, Political Campaign Mailing, to the mail to assist employees with identifying political campaign mail. The Postal Service uses PS Tag 57 to identify political campaign mailings during processing and distribution. Management must give immediate attention to political campaign mail when it receives information regarding processing or delivery delays. Officials should document inquiries made and the actions taken resulting from the delay of mail caused by processing or delivery.

If political campaign mailings arrive too late for delivery by the election date, officials should inform the mailer and document and maintain the notification in the political mail log. Management must also maintain these documents for a period of 6 months. In addition, if a significant portion of political campaign mail is undeliverable as addressed, officials must notify the campaign office before they dispose of the mail.

OBJECTIVES, SCOPE, AND METHODOLOGY

Our objectives were to determine whether U.S. Postal Service officials:

- Recorded political campaign mailings in the political mail log before inducting the mailings into the mail stream.
- Notified mailers who deposited political mailings that may be too late for delivery by the election date, of the potential for late delivery, and documented the advice provided to them in the political mail log.
- Documented all political campaign mail inquiries and their resolution.

We conducted our work at the Albuquerque District in New Mexico, the Maine District in Maine, and the Chicago District in Illinois. We selected the Albuquerque and Maine Districts because of news articles and complaints alleging the late delivery of political campaign mail that was handled at these locations. We selected the Chicago District because of the volume of political campaign mail handled at this location. Our scope covered political campaign mailings received at BMEUs and post offices during Quarters 1 and 2 of fiscal year (FY) 2008. We limited our scope to Quarters 1 and 2 of FY 2008 because BMEU managers and postmasters are required to maintain processing and delivery records for only 6 months.

To accomplish our objectives, we:

- Reviewed the *Postal Operations Manual* and Handbook DM 109 to obtain an understanding of the political campaign mail process.

- Analyzed political campaign mail mailings recorded in the PostalOne! system⁸ and the political mail logs for the Albuquerque, Maine, and Chicago Districts for Quarters 1 and 2 of FY 2008 to determine whether all political campaign mailings were recorded in the political mail log.
- Interviewed Headquarters Business Mail Acceptance, and Albuquerque, Maine, and Chicago District officials to determine whether they have a system to ensure all political campaign mailings received are recorded in the political mail log.
- Interviewed Albuquerque, Maine, and Chicago District officials to determine whether they notified mailers who deposited political mailings that may be too late for delivery by the election date, of the potential for late delivery, and documented the advice on the political mail log.
- Interviewed Headquarters Business Mail Acceptance, Government Relations, and Consumer Affairs; and Albuquerque, Maine, and Chicago District officials to determine whether they documented all political campaign mail inquiries and their resolution in the political mail log.
- Interviewed Headquarters Pricing and Classification, and Albuquerque, Maine, and Chicago District officials to determine why employees expedite all political campaign mailings during processing and distribution.

We conducted this performance audit from March through August 2007 and December 2007 through September 2008 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances.⁹ Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We relied on data obtained from PostalOne!. We did not directly audit PostalOne!, but performed a limited data integrity test to support relying on the data. We discussed our observations and conclusions with management officials on August 13, 2008, and included their comments where appropriate.

PRIOR AUDIT COVERAGE

The OIG has not issued any audit reports directly related to our objectives.

⁸ PostalOne! is a web-based system that offers a suite of services for business mailers and BMEU employees. PostalOne! provides BMEU employees the ability to enter postage statements, deposits, and other financial transactions, and retrieve reports necessary to manage the day-to-day business in their units. PostalOne! also provides mailers the ability to submit information to the Postal Service.

⁹ We suspended the project from August through December 2007 due to resource constraints.

APPENDIX B: DETAILED ANALYSIS

Political Campaign Mail Recordkeeping Needs Improvement

Officials did not always record political campaign mailings in the political mail log before inducting the mailings into the mail stream. We reconciled mailings identified in PostalOne! as political campaign mailings to the political mail log. The Albuquerque, Maine, and Chicago BMEUs did not record 5 percent (7 of 152) of the mailings identified in PostalOne! as political campaign mailings in the manual political mail log for Quarters 1 and 2 of FY 2008. In addition, officials maintained duplicate political campaign mail recordkeeping systems – an automated recordkeeping system contained in PostalOne! and a manual log.

As shown in Table 1 below, information contained in the two systems did not always reconcile. For Quarters 1 and 2 of FY 2008, officials at the Albuquerque, Maine, and Chicago BMEUs recorded 152 political campaign mailings in PostalOne! compared to 435 in the manual log. OIG and Albuquerque, Maine, and Chicago BMEU officials traced the transactions recorded in the manual log into PostalOne! and confirmed that the Postal Service collected postage on all 435 political campaign mailings.

Table 1				
Number of Political Campaign Mailings Quarters 1 and 2 of FY 2008				
Districts	PostalOne!	Manual Log	Political Mailings in PostalOne! but not in the Manual Log	Political Mailings in the Manual Log but not Identified in PostalOne!
Albuquerque	█	█	█	█
Maine	█	█	█	█
Chicago	█	█	█	█
TOTAL	152	435	7	299

Source: PostalOne! and the Political Mail Logs

Postal Service policy states managers, Business Mail Entry, and postmasters must keep documented records of all political campaign mailings deposited or received at their offices, with particular attention to those deposited or received too late for timely delivery. Employees must track political mailings daily on the political mail log.¹⁰

¹⁰ Handbook DM 109, Section 273.

According to managers at the Albuquerque, Maine, and Chicago BMEUs, employees are aware of the requirements to record political campaign mailings in the political mail log before inducting the mailings into the mail stream. However, they do not always comply with the requirements. Officials indicated that there are no controls to identify these errors. Because there were no controls to ensure all political mail transactions were recorded, we were unable to ascertain whether all political mailings were recorded in either the political mail log or PostalOne!. As a result, the Postal Service may not have adequate records to resolve customer complaints. This could also result in refund of postage, negative publicity, and an adverse impact on the Postal Service's goodwill and brand.

The Postal Service is also expending unnecessary labor costs to maintain duplicate political campaign mail recordkeeping systems. In 2004, Headquarters Business Mail Acceptance officials initiated actions to automate the political mail recordkeeping process in PostalOne!. However, officials did not coordinate their efforts with end users to properly implement the automated system and eliminate the manual process. The current Headquarters Business Mail Acceptance officials stated they cannot explain why the previous officials did not complete the automation of the political mail recordkeeping system contained in PostalOne!. Currently, employees have the option of checking the political mail indicator box in PostalOne! to identify mailings in the system as political campaign mail. If employees do not check the indicator box, PostalOne! does not record the transactions as political campaign mailing. As a result, 299 of 435 (69 percent) political campaign mailings recorded in the manual log were not identified in PostalOne! as political campaign mailings.

Mailings Deposited too Late for Delivery by the Election Date

Officials did not always notify mailers who deposit political mailings that may be too late for delivery by the election date, of the potential for late delivery, and document the advice provided to them in the political mail log. Albuquerque and Maine BMEU employees document the advice they provide to mailers on the postage statements. Chicago BMEU employees accept political campaign mailings that may be too late for delivery by the election date, but they do not notify mailers of the potential for late delivery.

Albuquerque BMEU employees stated they have had to adhere to several different standard operating procedures (SOP) over the years. They could not specify which SOP they are following or provide us with copies of their current or previous local SOPs. However, they indicated that they have been documenting the notifications on the postage statements instead of the political mail log.

By memoranda dated September 4, 2002, and May 14, 2008, the Political Mail Coordinator for the Maine District issued instructions to Maine BMEU employees to document, in the political mail log and the comments section of the postage statements,

the advice given to mailers who deposit political campaign mailings that may be too late for delivery by the election date, of the potential for late delivery. Because the political mail log does not provide a field to document the notifications, Maine BMEU employees devised their own method of documentation. Mailers who deposit political campaign mailings that may be too late for delivery by the election date at the Maine BMEU are required to sign a disclaimer that is prepared on stickers/labels. By signing the disclaimers, mailers acknowledge that Maine BMEU employees advised them that they deposited mail that may be too late for delivery by the election date. The stickers/labels are affixed on the postage statements.

Chicago BMEU employees stated their local SOP does not instruct them to notify or document advice given to mailers who deposit political mailings that may be too late for delivery by the election date, of the potential for late delivery.

Both the Handbook DM 109¹¹ and the POM provide guidance for handling late deposited political mail. The Handbook DM 109 specifies that employees should document advice provided to mailers who deposit late political campaign mailings in the political mail log, while the POM¹² requires that the advice be documented, but does not specify where this information should be documented. Although [REDACTED] and [REDACTED] BMEU employees are not documenting the advice on the political mail log as required by Handbook DM 109, they are complying with the POM.

If officials do not notify mailers that their political campaign mailings may not be delivered by the election date, mailers may not have the opportunity to use alternate delivery methods such as handing out the campaign material to potential voters. Additionally, if officials do not document the advice provided to mailers of the potential for late delivery, the Postal Service may not have adequate documentation to resolve customer complaints. This could result in the refund of postage fees, negative publicity, and an adverse impact on the Postal Service brand.

Political Campaign Mail Inquiries and their Resolution

Officials did not always document political campaign mail inquiries and their resolution. Albuquerque District Consumer Affairs officials document political campaign mail inquiries and their resolution in the Customer Activity Response and Exchange system. [REDACTED] District officials do not document any political campaign mail inquiries and their resolution, while the [REDACTED] District Consumer Affairs officials use a manual file to track political campaign mail inquiries and their resolution.

These conditions occurred because Postal Service policies in this area do not specify the officials responsible for accepting, processing, and documenting political mail inquiries, or provide guidance on the procedures to perform these functions. Postal

¹¹ Handbook DM 109, Section 273.

¹² Postal Operations Manual, Section 492.43.

Service policy states officials should fully document inquiries made and the actions taken resulting from the delay of mail due to processing or delivery.¹³

The Postal Service will not have adequate documentation to address customer complaints if officials do not document political campaign mail inquiries and their resolution. This could result in the refund of postage fees, negative publicity, and an adverse impact on the Postal Service's goodwill and brand.

¹³ POM, Section 492.44.

APPENDIX C: MANAGEMENT'S COMMENTS



September 29, 2008

Lucine Willis
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Office of the U.S. Inspector General
1735 N. Lynn Street
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SUBJECT: Draft Audit Report – Political Campaign Mailings
(Report Number MS-AR-08 DRAFT) (Project Number – 07RG001MS000)

Thank you for the opportunity to respond to the findings in your draft Political Campaign Mailings (Report Number MS-AR-08-DRAFT). Management agrees with some of the findings and non-monetary impact outlined in this report and accepts your recommendations. Management's responses to each recommendation are included below.

Recommendation 1:

Consolidate the manual political mail log into the automated recordkeeping system in PostalOne! for all sites that have access to the PostalOne! system. Require sites that do not have access to the PostalOne! system to maintain the manual political mail log and transmit the political campaign mailing information to their respective Business Mail Entry Units to be entered into PostalOne!.

Response:

Management does not agree with this recommendation. The comments to this recommendation state; "In addition, officials maintained duplicate political campaign mail recordkeeping systems – an automated recordkeeping system contained in PostalOne! and a manual log. Information contained in the two systems did not always reconcile. The PostalOne! system was never designed to be a data collection and management system for political mail logs. The current manual log process is effective in ensuring enough information is obtained to deal with any customer issues that appear. We will make some revisions to the log to capture USPS disclaimer for mailings arriving potentially too late for delivery before election. We will conduct communications and training awareness around election periods. We will include evaluation of this process on our self audits. These actions will be completed by the end of 2008.

Recommendation 2:

Program PostalOne! to require employees to identify political campaign mailings in the system.

Response:

Management does not agree with this recommendation. There is already a system capability to indicate if a mailing is a political mailing or not. Employees are required to identify if mailings are political or not. There was not any data provided as to how many statements political mailings produce from all of the statements produced but they are a small amount and only seasonally frequent compared to the universe of statements (approximately 14 million yearly). Adding an additional step to this process would increase costs with minimal benefit. If this step only took one second, then that would add 14,000,000 seconds to each statement which equates to about 38,000

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work hours. Programming the system to make employees acknowledge they have either complied or not is costly and within a period of time employees would figure out the key strokes to indicate the mailing is not political without conscious effort minimizing the value of the implementation. We will conduct communications and training awareness around election periods. We will include evaluation of this process on our self audits. These actions will be completed by the end of 2008.

Recommendation 3:

Reinforce to employees the importance of recording political campaign mail information.

Response:

Management agrees with this recommendation. We will conduct communications awareness and training sessions particularly around campaign and election periods. We will add steps to our self audits that include checking for political mail logs and validating postage statements are properly recorded in the PostalOne! system. We expect to complete this by the end of 2008.

Recommendation 4:

Include a field in PostalOne! for employees to document the advice provided to mailers regarding late arriving political campaign mail, and revise the guidance in Handbook DM 109, *Business Mail Acceptance*, and the *Postal Operations Manual* to instruct the employees to use PostalOne! to document this advice.

Response:

Management partially agrees with the recommendation. The system already has a field where comments are captured. The postage statements have a *comments* section located at the bottom of the statement where employees can enter any additional information relevant to the mailing. We will also add a comments section to the political mail log where employees can document information regarding advice given to mailers regarding the lateness of the mailing's entry for acceptance. We will add a comment in the political mail section of the DM 109 to cover these steps. We will conduct communications and training awareness around election periods. We will include evaluation of this process on our self audits. We expect to complete this by the end of 2008.

Recommendation 5:

Reinforce to employees the importance of advising mailers regarding late arriving political campaign mail.

Response:

Management agrees with the recommendation and has addressed this recommendation in the above response. We expect to complete this by the end of 2008.

Recommendation 6:

Develop standard operating procedures for accepting, processing, and documenting political mail inquiries and their resolution. The standard operating procedures (SOP) should clearly define areas of responsibility and provide a method for tracking political mail inquiries and their resolution.

Response:

Management agrees with this recommendation. The responsibility rests with the Consumer Advocate's Office. The Postal Service's Office of the Consumer Advocate directs Consumer Affairs Managers (CAMs) in each postal service district to address customer inquiries. The CAMs utilize the Customer Activity Response and Exchange (CARE) system to track customer inquiries and their resolutions.

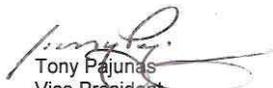
Recommendation 7:

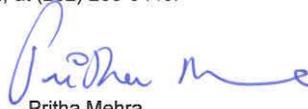
Provide training for officials responsible for resolving political campaign mail complaints to make them aware of the requirements for handling political campaign mail inquiries and their resolution.

Response:

Management agrees with this recommendation. The responsibility rests with the Consumer Advocate's Office to develop training for the Consumer Affairs Managers (CAMs). The Postal Service's Office of the Consumer Advocate directs CAMs in each postal service district to address customer inquiries. The CAMs utilize the Customer Activity Response and Exchange (CARE) system to track customer inquiries and their resolutions.

If you have any questions or require additional information, please contact Bob Galaher, Manager, Business Mail Acceptance, at (202) 268-7018; or Robert Faruq, Manager, Consumer Affairs Field Support and Integration, at (202) 268-8440.


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