

POSTAL SERVICE

**Monday
December 10, 1979**

Part VI—Section E

Postal Service

Draft Consumer Program

POSTAL SERVICE**Draft Consumer Program; Report on Implementation of Executive Order 12160****AGENCY:** Postal Service.**ACTION:** Draft Consumer Program.

SUMMARY: This notice responds to section 1-501 of Executive Order 12160, Providing for Enhancement and Coordination of Federal Consumer Programs (the Order). Section 1-501 of the Order requires that each executive agency publish in the **Federal Register** for public comment a draft report on its consumer programs, including the following five elements: (1) Consumer Affairs Perspective, (2) Consumer Participation, (3) Informational Materials, (4) Education and Training, and (5) Complaint Handling. Although the Postal Service is not subject to the Order, it has chosen to participate to the extent practical and feasible consistent with the public interest and fulfillment of the primary mission of the Postal Service.

DATE: Comments must be received on or before March 10, 1980.

ADDRESS: Written comments should be mailed or delivered to the Consumer Advocate, Headquarters, U.S. Postal Service, Room 5806, 475 L'Enfant Plaza West, Washington, D.C. 20260. Copies of all written comments received will be available for public inspection and photocopying between 9:00 a.m. and 4:00 p.m., Monday through Friday, at the above location.

FOR FURTHER INFORMATION CONTACT: Mr. Thomas Chadwick, (202) 245-4550.

SUPPLEMENTARY INFORMATION: The President issued Executive Order 12160 entitled "Providing for Enhancement and Coordination of Federal Consumer Programs" on September 26, 1979. The Order establishes a Consumer Affairs Council consisting of representatives of twelve named Federal departments, plus such other officers or employees as the President may designate.

The Chairperson of the Council, assisted by the Council, is required to insure that agencies review and revise their operating procedures so that consumer needs and interests are adequately considered and addressed. To this end agency consumer programs are to be reviewed and revised, as necessary, to meet the five elements outlined in the Summary above. Since the Order is not based on statutory authority made applicable to the Postal Service, the Order does not cover the Postal Service as a matter of law. Nevertheless, the consumer program of the Postal Service has been tailored to meet the five elements specified in the Order, and reads as follows:

DRAFT POSTAL SERVICE CONSUMER PROGRAM**1. CONSUMER AFFAIRS PERSPECTIVE****(a) Consumer Advocate**

In 1971 the Office of the Consumer Advocate was created to provide a direct channel of communication

between postal customers and the Postal Service. The Consumer Advocate is the spokesman for the individual mail user. He provides an independent evaluation of mail service to the individual customer. He also expedites action on customer inquiries and complaints and is responsible for seeing that the appropriate office takes corrective action. He makes recommendations for policy changes to improve the individual user's mail service and acts as liaison with consumer groups.

The Consumer Advocate is an officer of the Postal Service with authority to cut redtape and enter anywhere in the Postal Service to obtain solutions to consumer problems. The Consumer Advocate manages the Office of Consumer Affairs. The Office of Consumer Affairs is organized into two divisions: the Consumer Response Division and the Consumer Support Division. Responsibility for investigating, resolving and responding to consumer complaints and inquiries rests with the Consumer Response Division, which also recommends policy changes affecting services in top management deliberations and decisionmaking.

The Support Division has the responsibility for analyzing consumer complaints received at post offices and national Headquarters. This division also is charged with administering the National Consumer Service Card Program.

(b) Location of Consumer Affairs

The Office of Consumer Affairs is located in the Customer Services Department at Postal Service Headquarters. 39 CFR 224.1(c)(3)(iv). The Consumer Advocate reports to the Assistant Postmaster General, Customer Services, but as an officer maintains a dotted-line relationship to the Postmaster General and other officers, which entitles him to direct access to each of them. 39 CFR 221.7.

(c) Consumer Affairs Staffing

The consumer affairs staff includes project and program managers, complaints analysts, clerk typists and secretaries. The immediate Headquarters staff has an authorized complement of twenty-seven positions. It should be noted that several other organizations at Postal Service Headquarters perform some consumer affairs functions, and thousands of field employees handle consumer affairs matters as part of their jobs, in part at the direction of the Office of Consumer Affairs.

(d) Other Consumer Affairs Staff Responsibilities

The Office of Consumer Affairs has associates who investigate, resolve and respond to consumer complaints, inquiries and suggestions received at Postal Service Headquarters. Consumer Affairs also administers the national Consumer Service Card Program for recording and analyzing consumer complaints received at post offices. A detached unit with an authorized complement of ten positions supports the card program.

(e) Relationship to Other Staffs

The Office of Consumer Affairs, Customer Services Department, acts in conjunction with the Public and Employee Communications Department to educate consumers concerning postal services and products. Consumer Affairs also cooperates with the Postal Inspection Service and the Consumer Protection Division of the Law Department in solving mail order problems and in protecting consumers from mail fraud and misrepresentation. Consumer Affairs works with market research specialists to develop information on consumer awareness of and satisfaction with postal consumer programs. Complaints analysis reports prepared by Consumer Affairs are used by operations managers in their efforts to improve services.

(f) Review of Policies and Programs

To the extent appropriate, proposed changes in rules, policies, programs and legislation are referred to the Office of Consumer Affairs for comment prior to final decision.

(g) Stages of Participation in the Decisionmaking Process

Consumer Affairs staff participates in the decision-making process by serving on task forces, performing independent studies of services and policies, meeting with top agency officials, and submitting written comments on proposals.

2. CONSUMER PARTICIPATION**(a) Stages of Consumer Participation**

(1) The Postal Service takes steps to provide for early and effective public participation in the rulemaking process. While a regulation is in the early stages of development, the Postal Service ordinarily calls it to the attention of parties known to have an interest in it. For example, the Postal Service, prior to the publication of its packaging regulations in proposed rule form, conducted an intensive packaging task force study with the cooperation of major mailers' associations. The packaging regulations thus were able to reflect commercial standards identified during the study.

When the Postal Service determines that the general public would be interested to comment on a proposed new or amended regulation, the Service publishes the proposed regulation in the **Federal Register**, generally with 30 days allowed for comment. At or about the same time, if it is believed that the rule has or might have a wide effect on the general public, the Postal Service issues a press release informing the public of the proposal and inviting their comments.

(2) Consumers can participate in proceedings before the Postal Rate Commission. The Commission is an independent agency established by the Postal Reorganization Act (39 U.S.C. 3601-04). The Commission conducts formal hearings on proposed changes in postal rates, fees, and mail classification and issues recommended decisions to the Governors of the Postal Service. The Commission also holds

formal hearings on proposed changes in the nature of postal service on a nationwide or substantially nationwide basis. An officer of the Commission is designated to represent the interests of the general public in these proceedings.

(3) Before making a determination as to the necessity for closing or consolidating any post office, the Postal Service must notify the persons served by such post office, at least 60 days before the proposed date of closing or consolidation, to insure that they will have an opportunity to present their views. Persons served may appeal a decision by the Postal Service to close or consolidate a post office to the Postal Rate Commission.

(4) The Postmaster General considers the views of the Citizens Stamp Advisory Committee before selecting the subjects and artwork for stamps designed for philatelic purposes. Members of the Committee are expert in the fields of art, printing, history and philately.

(5) The Postal Service recently started a program to expand Postal Customer Councils to involve consumers. Consumer Affairs also experimented with the Town Hall meeting concept but this has not been fully tested.

(b) Avenues of Participation

(1) Users of postal services participate in the development of postal regulations by commenting in writing or orally on proposed regulations published by the Postal Service in the **Federal Register**.

(2) Consumers may participate in Postal Rate Commission proceedings in accordance with Commission rules, and may appeal decisions of the Governors of the Postal Service to any U.S. court of appeals.

(3) Persons served by a post office being considered for closing or consolidation may comment in writing on the proposal, and may file a written appeal to the Postal Rate Commission of any determination to close or consolidate a post office.

(4) Postal customers may make written recommendations to the Citizens Stamp Advisory Committee concerning their choices for new stamps.

(5) The Postal Service welcomes suggestions and comments from postal customers. In many communities the Postal Service sponsors Postal Customer Councils, which provide an opportunity for discussion with customers about service problems and suggestions and to help the public better understand the Postal Service. The Councils conduct mailing clinics, discussion panels, seminars, and tours of postal facilities. Local postal officials are encouraged to meet with consumer representatives to discuss plans for changes in local policies and services.

(c) Analysis and Consideration of Consumer Concerns

A variety of research is done to determine consumer concerns. Customer attitude surveys are prepared by market research specialists. Complaint analysis reports are circulated to management. Surveys are

made to determine consumer satisfaction with consumer affairs programs.

(d) Responsibility for Citizen Participation

Except for public rulemaking proceedings, post office closings, and proceedings before the Postal Rate Commission, the Consumer Advocate will be responsible for implementing agency consumer participation responsibilities under Executive Order No. 12160. Responsibility for citizen participation in public rulemaking proceedings and post office closings rests on the staff of the operating division.

(e) Consumer Participation Forums

Details concerning the format, level of participating agency officials, geographical dispersion, and approximate number per year of forums to facilitate consumer interaction with agency officials are not available at this time. This information will be available when tests of various methods for citizen participation have been completed.

(f) Publicity for Consumer Participation

As noted above, the Postal Service issues press releases requesting public comment when a rule is proposed that the Service believes might have a wide effect on the public. In addition, major mailers are frequently notified orally or by mail of such proposed rule changes. As to post office closings, the Postal Service posts a notice on the bulletin board of the post office affected. We are also developing a communications program as part of our tests of citizen participation methods.

3. Informational Materials

(a) Current Informational Materials

The Postal Service produces and distributes to post offices several booklets and pamphlets to inform consumers about the various classes of mail and mail services in general and about specific areas of interest such as packaging and mail fraud.

There are also major informational efforts each year to promote an awareness to "Shop Early—Mail Early" at Christmas, and a Postal Consumer Protection Week (held this year from Sept. 24–29, 1979) to warn the public about mail fraud and false representation through the mails. The latter program has done much to increase the public's knowledge of these problem areas, and how the work of the Postal Service's Inspection Service, Consumer Protection Division, Consumer Advocate and the Judicial Officer protects the public.

A basic publication available at post offices that contains much useful and general information about postal services is the *Mailers Guide* (Publication 19). It has information about each class of mail, service standards and background on special services. A shorter, more concise pamphlet containing much of the same material is *A Consumer's Directory to Postal Services and Products* (Publication 201). Also available at post offices, it touches on such subjects of

interest to consumers as claims for lost or damaged mail; passport applications; mail forwarding; Self-Service Postal Centers and Stamps by Mail.

There are several pamphlets on specialized areas such as parcel post, packaging, mail fraud and services like Express Mail that contain information of interest to consumers. These various publications are available at post offices where copies can be had free of charge.

These various publications are updated periodically, but some of the information is subject to change and will not always be current. The new *Domestic Mail Manual* and the weekly *Postal Bulletin*, maintained at all post offices and available to the public for reference, are the primary sources for current postal rates and regulations. Subscription to these publications can be purchased by writing the Government Printing Office, Washington, D.C. 20402. *The National ZIP Code and Post Office Directory* combines ZIP Code information for every mailing address in the nation with listings of post offices arranged in several convenient ways. It also can be ordered by writing the Government Printing Office.

Business consumers may find *Memo to Mailers*, a monthly publication that advises on rate and classification changes as well as other postal news, quite helpful. It can be ordered free of charge by writing to: Memo to Mailers, P.O. Box 1600, La Plata, MD 20646.

(b) Plans for Additional or Revised Informational Materials

Plans this year for revised informational materials center on the introduction of the new Consumer Service Card, tentatively scheduled for introduction in early calendar 1980. These materials will be developed at headquarters and distributed to post offices through the postal supply system. The promotion effort will be carried out by headquarters, regional communication staff and by public information officers at various postal facilities in cooperation with Regional Consumer Service Card Coordinators.

The communication efforts to promote the revised card and increase the public's perception of the existence of a way to make complaints and suggestions about service will likely include the following elements: television and radio public service announcements; localized news releases; newspaper advertisements; speeches and press conferences by postmasters; briefings and a possible slide show for postal employees; and possible media tours by the Consumer Advocate.

There are also likely to be lobby displays and a redesigned card holder to increase public awareness of the Consumer Service Card when visiting the post office.

(c) Timetable for New Informational Materials

The materials mentioned in the previous section will be produced during 1980.

(d) Distribution of Informational Materials

A variety of methods are employed to distribute informational materials. Some publications are available free in post office lobbies, others are available by subscription. Television and radio public service announcements, newspaper advertisements, press releases and speeches are other methods currently used to inform consumers.

(e) Responsibility for Consumer Information Program

The Public and Employee Communications Department and the Office of Consumer Affairs, Customer Services Department, are responsible for the planning and performance of the consumer information program. The Office of Consumer Affairs publishes *A Consumer's Directory to Postal Services and Products* (Publication 201) and advises and assists the Public and Employee Communications Department on consumer information matters. As noted above, responsibility for informing consumers of public rulemaking proceedings and post office closings rests upon the staff of the operating division proposing the change.

(f) Informational Materials Regarding Meetings Open to the Public

With respect to providing material about Postal Service meetings open to the public, the Law Department prepares and publishes in the *Federal Register* the Government in the Sunshine Act notice announcing the time, location, and agenda of the monthly meeting of the Board of Governors. Based on this information the Public and Employee Communications Department prepares news releases concerning the Board of Governors' meetings. These releases are distributed to the national press in Washington, D.C., posted in the lobby of the postal facility at the site of the meeting, and made available at the start of each meeting. Public and Employee Communications Department personnel and other postal employees are present at each meeting to explain the order of business and agenda items.

4. EDUCATION AND TRAINING**(a) Education Responsibility**

The Office of Consumer Affairs will be responsible for educating the USPS staff about the Order and related activities.

(b) Information Dissemination

Policymaking personnel (APMGs and above) will receive in-person briefings. Regional RPMGs will receive packets containing the briefing script and copies of the Order. The Order will be published in postal publications with an explanation of USPS activities.

(c) Communication of Significant Changes

Significant changes in the consumer program as a result of the Order will be communicated through the use of a Headquarters Circular.

(d) Specialized Training

The Consumer Advocate will be responsible for providing specialized training to Consumer Affairs personnel.

(e) Areas of Training

Training has been provided and will continue to be provided as follows:

(1) Consumer Affairs Associates—will provide training in complaint-handling, administrative management, Postal Service operations, telephone techniques, communicating through writing, and post office procedures.

(2) Technical Staff Members—will provide training in statistical techniques, computer technology, administrative management, and systems analysis.

(f) Technical Assistance Responsibility

Technical assistance is provided to all large companies and organizations through Customer Service Representatives at the local level. It is provided for individual customers at the local post office.

(g) Type of Technical Assistance

The assistance relates to mail preparation, the availability and applicability of products and services, cost savings techniques, and customer needs analysis.

(h) Who Receives Technical Assistance

All customers receive technical assistance from their local post offices upon request. The Office of Consumer Affairs also provides technical assistance, when appropriate, from the national level to consumers and major customers.

5. COMPLAINT HANDLING

An independent contractor recently completed a four-year study of complaint-handling procedures in twenty-two Federal agencies. The Postal Service received the highest available ratings in each category reviewed. While pleased with progress to date, the Postal Service continues to improve complaint handling through testing and implementation of the latest developments in systems and equipment.

(a) Public Awareness

The Office of Consumer Affairs, Customer Services Department, works with the Public and Employee Communications Department to increase public awareness of postal complaint-handling programs. Consumer Service Cards are placed in display units located in prominent positions in every post office lobby. *A Consumer's Directory to Postal Services and Products* (Publication 201) is available free at all post offices and explains how customers may register complaints locally and with the Consumer Advocate. Every year, as part of Consumer Protection Week, the

Consumer Service Card Program is promoted through press releases.

(b) Logging Complaints

All complaints received by the Office of Consumer Affairs at Postal Service Headquarters in Washington are logged in, coded by complaint category and coded for routing to the proper complaint-handling group.

Copies of all Consumer Service Cards completed by postal personnel from customer phone calls, letters, or in person visits as well as those cards completed by customers are received in Washington. These are coded for complaint type and date.

(c) Routing to Proper Office

Complaints received at the Office of Consumer Affairs needing specialized attention are routed to the proper office within Postal Service Headquarters or a field office for investigation and a report on which the Office of Consumer Affairs can base a response.

Mail Order problems, fraud, etc., are referred to the Inspection Service for referral to field inspectors.

(d) Tracking Complaints

All complaints, other than those referred to the Inspection Service, received by the Office of Consumer Affairs are tracked through use of a weekly computer report. This assures timely response.

All complaints registered on Consumer Service Cards by USPS employees or customers are tracked through the use of a computer report. Complaints appearing on this report are followed up directly with the post office involved.

(e) Responding to Complaints

All customer complaints received at the Office of Consumer Affairs which must be referred to field offices receive an interim response. This response notifies the customer of the referral to the post office and the person who may be contacted for further information. The Post Office is instructed to contact the customer within seven days.

(f) Statistical Reporting

Statistical Reports are provided quarterly for all complaints received at the Consumer Affairs Office. National Profile and trend analysis by complaint type are included in the reports. The reports are forwarded to decision-making management levels at USPS Headquarters.

Analytical, follow-up, and maintenance reports are produced each accounting period from Consumer Service Cards data. Profile and trend analysis for each level of management including postmasters is produced and distributed.

(g) Evaluation

Periodic National Consumer Satisfaction Surveys are conducted. These surveys deal with complaints handled exclusively by the Consumer Affairs Office and those referred to field offices for resolution. Major

areas covered include timeliness of response, effectiveness of the resolution, and recurring problems.

W. Allen Sanders,

Associate General Counsel for General Law and Administration.

BILLING CODE 7710-12-M

Form Approved:
OMB No. 116579021**CONSUMER RESPONSE FORM FOR EXECUTIVE ORDER 12160**

Dear Consumer:

The _____ (agency) wants to make its consumer program better and more responsive to you, the consumer. We would like your thoughts and suggestions for improving our proposed consumer program. Please help us by answering the following questions:

1. Which of the following statements best describes your interest in our consumer program?
 - I am interested in it as an individual consumer.
 - I am concerned about it, because I represent a public interest consumer group.
 - I am concerned about it, because I represent a private company or organization.
2. After reading about our consumer program, do you think you understand how it works?
 - Yes, it is clear and I understand it.
 - Yes, I understand most of it.
 - No. Much of it is not clear to me.
3. Part of our consumer program sets up ways for consumers to help us make policies and rules. Do you feel our program makes it easier for you to participate?
 - Yes.
 - No. Why? _____
4. Our proposed consumer program outlines how we plan to get information out to consumers. How adequate do you think our plan is?
 - It seems adequate.
 - It is not adequate. Why? _____
5. We want to make it easy for consumers to bring their problems to our attention. Our proposed program tells how we intend to handle complaints from consumers. How good is our plan?
 - Adequate.
 - Not adequate. Why? _____
6. After reading our proposed consumer program, do you know whom or which office in _____ (agency) to contact if you have:
 - A complaint? Yes. No.
 - A general question about the agency? Yes. No.
 - A question about how to take part in agency proceedings? Yes. No.
7. Do you know who or which office in _____ (agency) speaks for the consumer? Yes. No. Any suggestions for improvement? _____
8. Do you have any suggestions for improving our consumer program?
 - No.
 - Yes, in the following areas:
 - Consumer participation _____
 - Informational materials _____
 - Complaint handling _____

9. Other comments or suggestions? (Use additional pages, if necessary.)

(Your name)

(Your address)

(City, state, zip)

SEND THIS FORM DIRECTLY TO THE AGENCY PROPOSING THE PROGRAM ON WHICH YOU ARE COMMENTING