

prepared in full 2-foot and/or 1-foot carrier route trays. Mail that cannot be placed in full carrier route trays must be placed in 5-digit carrier routes trays, which may be less than full when necessary.

n. Machinable Addressing/Upgradable

The Postal Service has proposed optional presort requirements for Retail Presort First-Class and Regular Standard Mail that meets the Postal Service criteria of "upgradable" mail. (Upgradable mail is mail that can be processed on Postal Service MLOCs.) Four commenters voiced concerns about the requirement for a machine-printed address on a mailpiece before it could be considered upgradable.

One commenter opposed the proposal, arguing that presort bureaus will have to separate their automation reject mail on the basis of physical characteristics and then prepare it under two sets of rules. This commenter requested that mailers be given an extra day to attempt to barcode the automation rejects, without redating metered mail, in order to increase the barcoded volume. By adopting this approach, according to the commenter, mailers will be positioned to benefit from soon-to-be-available technology that will make it possible to barcode more rejected mailpieces. In much the same vein, a government agency said that the requirement is too restrictive and that several federal agencies have purchased encoding systems in order to place barcodes on typewritten and handwritten mail.

The proposed DMM standards specify that preparation of mail under the provisions for upgradable mail is optional. Accordingly, First-Class and Standard mailers may prepare all their mail not qualifying for the Automation subclass under the basic preparation standards for the corresponding Retail Presort or Regular rates. Naturally, mailers are encouraged to apply delivery point barcodes to such pieces using CASS-certified encoding systems and thereby enter as many pieces as possible as Automation First-Class or Standard Mail. However, for the reasons set forth in the preceding discussion of 100% barcoding, the Postal Service cannot allow mail to be presented with stale meter dates. The current procedures for allowing mailers to print a new meter date will remain in effect for all mail, including upgradable and automation-reject pieces. The proper subclass marking must also appear on these pieces.

o. Machinability

One commenter asserted that the Postal Service will not achieve its objective of encouraging more automation-compatible mail unless it relaxes machinability standards to allow more mailers to prepare automation-compatible mail.

The Postal Service cannot spontaneously relax machinability standards. Such standards are based on the capabilities of automated mail processing systems and the type of mail that automation equipment is able to process.

p. Tray Sleeve and Strapping

The Postal Service proposed that mailings of Automation letter mail be both sleeved and strapped by the mailer, and that trayed letter mail in other reformed subclasses be sleeved by the mailer. Five commenters responded to this proposal. One commenter expressed wholehearted support on the condition that the mailer, not postal employees, perform the associated tasks. One commenter strongly recommended that where all pieces in a mailing originate and destinate in the delivery area, sleeving and banding of trayed letter mail should not be required. This commenter wants continuation of the existing provision in DMM M033.3.7 (that allows local exception to the sleeving requirement when all pieces in a mailing originate and destinate in the delivery area of the same SCF). Another commenter contended that local post offices should be able to determine when sleeving and strapping are required based on mailing destinations. A third commenter wanted a phased implementation to have time to order and install equipment needed for sleeving and strapping. A federal government agency voiced concern about requirements for stocking, storing, and using many different types of equipment.

The Postal Service plans to require sleeving and strapping of all bedloaded trayed mail under all reformed subclasses, with the exception of mail entered at a postal facility that destinate within the service area of that facility. Mail transported without first being sleeved is susceptible to spillage and damage during transportation and handling. A strap around the tray is also necessary to maintain the integrity of the tray and its contents during transportation and handling. For example, because trays of Periodicals and Standard Mail sorted in a BMC move on belts and down chutes during mechanized distribution, sleeves that are not strapped to trays could slide off

and the contents of the tray could spill. Trays transported by air are handled in many different ways and also need to be strapped to maintain their integrity. Because local mail is not subject to the same type or amount of transportation as other mail, an exception may be made for the strapping and sleeving of this mail. Local mail that destinate within the service area of the postal facility where it is entered may be prepared without sleeving and strapping, if prior written approval is obtained from that facility's manager.

For palletized mailings, sleeving will be required but strapping will be optional for mail on 5-digit, 3-digit, and SCF pallets, if those pallets are wrapped with stretchable or shrinkable plastic wrap to maintain their integrity during transportation and handling, because these pallets remain intact until reaching the destination plant or destination 5-digit delivery unit. Trays on other levels of pallet will be required to be both strapped and sleeved.

q. ACT Tagging

The Postal Service proposed that mailers apply ACT tags to trays of Automation First-Class letters. Six commenters responded to this proposal. Of these, one supported the proposal as long as mailers, not postal employees, did the work of preparing the tags. The remaining five commenters either had serious reservations or were strongly opposed to this proposal if it applied to trays of nonlocal letter- and flat-size mail. One of the five strongly opposed tagging nonlocal mail, stating that it was burdensome and difficult to comply with due to time-sensitive airline flight schedules, and that the rates proposed for the Automation subclass do not reflect this added worksharing requirement. Another commenter expressed the view that requiring ACT-tagging of all Automation subclass letter mail trays adds little value and should not be required at this time. The commenters believed that the proposal should be optional until a method can be developed and implemented so that mailers could access a database of accurate postal air contract transportation and flight data for ACT tags.

Based upon the comments, the Postal Service has determined to remove the proposed requirement for ACT-tagging of mailings. The Postal Service is also in the process of revising its internal systems to replace the ACT tags with the "Scan-Where-You-Band" process.