

EXHIBIT 35

SUBJECT: Extraordinary Measures – Return Ballot Mail Processing Policy for the last week of the 2020 Election

This document is being issued to provide specific guidance in administering and managing Mail Processing outlined in the Extraordinary Measures Memorandum for the upcoming 2020 election. In addition to the other extraordinary measures that are already in place, the key points for processing and clearance expectations on Sunday, November 1 through Tuesday, November 3 are discussed below. If you have any questions, please contact Kevin Bray at (205) 317-6312 and Kevin.P.Bray@usps.gov.

Prior to Sunday, November 1, the following steps must be taken to extract the Election Ballots.

Each originating plant must designate a DBCS/DIOSS/CIOSS machine that will process the Sunday, November 1, 891 FIM program. Sites that do not normally process 891 FIM will plan for the sort program and machine that is used Mon-Fri to sort FIM downflow from the AFCS. This program will ensure local downflow and direct holdouts for return ballots are processed and extracted with minimal processing and made available for delivery on Monday, November 2, 2020. Early Monday morning, originating plants must ensure dispatch of local mail extracted from AFCS and FIM downflow are dispatched to the partner sites. Additionally, the receiving plants must ensure that ballot mail is identified and processed first in their local Incoming Primary operations.

All plants that process Incoming Primary letters and flats must put plans in place to clear their local letters and flats by Monday DOV to delivery offices and/or local pickup. Plant managers will be required to certify by **10:00** AM local time on Monday that the ballot mail is clear. Additionally, letters and flat mail processed after DOV on Tuesday, or return ballots identified in collections, will require extraordinary measures to ensure that ballots will be delivered by the designated time on Election Day, November 3. Operating plans must include:

- Run plans must be updated to ensure the machine and employees are identified on Sunday to process 891 FIM/LONG/SHORT or MUL and, if necessary, AFSM100 programs
- All originating plants that process letter and flats must update their sort programs to include their service area Board of Election (BOE) holdouts. Originating plants may choose one of the options below, based on volume and local operations capability:
 - Jackpot all BOE ZIP Codes into a single bin to downflow to locally created sort program that will finalize all direct BOE ZIP Codes.
 - Hold out individual direct ZIP Codes on 891M FIM or appropriate Long/Short/MUL sort programs to be dispatched directly to the BOE.

The following steps must be completed regarding sort programs:

- Must be updated no later than 17:00 PM EST Friday, October 30, 2020.
- Must include all holdouts on either primary or downflow sort programs. These sort programs must be downloaded to all machines by Sunday, November 1, 2020 prior to processing any collection mail.
- **Individual** BOE holdouts for letters must use CIN 167 for letters. Holdouts must be designated on FIM letter sort programs, LONG/SHORT and, if used locally, the MUL programs must ensure we capture all election returns for local delivery.

- **Jackpot** BOE holdouts for letters must use CIN 174. Holdouts must be designated on FIM letter sort programs, LONG/SHORT and, if used locally, the MUL programs to ensure we capture all election returns for local delivery.
- AFSM-100 Primary and/or downflow programs must be updated to add 9-digit holdouts for local service BOE's. CIN 173 will be used for direct 9-digit holdouts for flats.
- These sort programs will be used in processing operations through Tuesday, November 3, and later if necessary to support deliveries in the states listed in [Table 2](#). The mail flow changes must be communicated to all employees, supervisors, and management staff to include all consolidation and dispatch plans.

Sunday, November 1, 2020

Delivery units will run regular collections on Sunday (Monday-Friday schedule). Local plant operations will schedule employees and supervisory staff to ensure that we cancel and process collection letters and flats on Sunday to extract return ballots to the BOE. In the collection operation, the following steps must be taken:

- All stamped and metered flats trays and tubs must be riffled to extract Election Mail logo flats mail.
- Election Mail logo flats will be cancelled using the hand stamp and flow to a manual case to ensure each office receives their flats mail. If the volume warrants, AFSM-100 operations can be used to sort the mail.
 - If volume dictates, AFSM-100, IJC 1 should be used to place a date stamp on the flats. Sort programs with the appropriate holdouts will be used on Sunday if volume dictates to capture the flats ballots.
 - AFSM-100, IJC date stamps will reflect November 1, 2020.
- Riffle trays/tubs from the manual or machine process for the Election Mail logo to ensure legible date stamps are on all flats mail pieces.
- Hold out local service area return ballots and those of the originating partner sites in any manual or AFSM-100 sort program to ensure early clearance.

All AFCS 200 and AFCS OCR sites will cancel letter mail using the Dual Pass Rough Cull (DPRC) system. Upon completion of the letter cancellation operations on AFCS, follow the processing steps:

- Flow FIM stacker mail to the 891M sort program LONG/SHORT/MUL.
- FIM mail extracted from collections should be processed to ensure Election mail is captured into DIRECT FIRM holdout bins wherever possible based on density and available discretionary bins.
- If there are not enough discretionary bins or low volume, use a "jackpot" MIXED FIRM bin with CIN 174
- Flow jackpot trays to a locally created 893/4/6/7 sort program to consolidate Election mail if needed. Use CIN 167 for all DIRECT Board of Election holdouts.
- Riffle each tray for the Election Mail logo to ensure a legible date stamp is visible on each letter mail piece.

- Local mail from AFCS operations will be staged, identified, and processed first on an Incoming Primary sort program Monday morning. Appropriate measures must be taken as necessary on Monday morning to ensure state requirements are met to deliver local ballots by the cutoff time for Election Day (please see [Table 1](#)).

Monday-Tuesday November 2-3, 2020

Processing of collection mail will be accomplished as normal for Monday-Tuesday, November 2-3. We will follow the process outlined for Sunday for direct holdouts to expedite the handling of election mail for originating letters and flats operations for delivery or pick up.

We will continue to keep the direct holdouts in each plant on November 3 ([Table 1](#)), and also until the final date of acceptance for the states ([Table 2](#)) serviced by the originating plant.

Each plant must be knowledgeable of the deadlines in each state for which the plant is cancelling local mail. If there are any questions on a state's deadlines or other requirements, contact the Law Department for clarification: David Belt, David.C.Belt@usps.gov, or Abigail Healy, Abigail.K.Healy@usps.gov.

All outgoing plants will coordinate a "Last Date of Election" mail process with delivery on:

- November 3 for deliveries in all states (November 2 in Louisiana) ([Table 1](#)), AND
- The final date for ballot receipt for each state that allows mail-in ballots to be delivered on a date later than November 3 ([Table 2](#)).

Plants must NOT allow the return ballots to flow to DPS programs on November 3 (November 2 in Louisiana). All measures must be in place to identify Primary outgoing and incoming programs to ensure efficient and early delivery of ballot mail.

Special Handling for Delivery by November 3, 2020

Special procedures must be put in place to ensure we deliver every ballot possible by the cutoff time on Election Day (November 2 in Louisiana) ([Table 1](#)), even in "postmarking" states that allow for later delivery.

All processing plants will be required to run early collections and follow the "Extraordinary Measures Memorandum" process for retention of election mail in delivery units beginning on November 1 through November 3.

All Plant operations must process all early arriving collection mail to extract all Election mail for turnaround by the cutoff time. Sites may serve multiple states and time zones, so special attention must be made to the states your plants serve.

Each plant with an originating or destinating sort program should familiarize themselves with the specific requirements and establish a process to deliver mail by the required time on November 3 (November 2 in Louisiana), AND on the final date that a state accepts mail-in (if later than November 3). We will continue to deliver the mail daily regardless of the deadlines for each state. The specifics listed below are provided as a guide to expedite when required.

Reference Tables

Below for your reference are the Election Day return deadlines for every state (as of October 23, 2020) in [Table 1](#), and any extensions of this deadline based on the postmarking date in [Table 2](#).

These are subject to change based on local laws and court rulings, so consult contact the Law Department for clarification: David Belt, David.C.Belt@usps.gov, or Abigail Healy, Abigail.K.Healy@usps.gov.

Table1: State Return Deadlines for Election Day as of October 23, 2020

State	Return Deadline
Alabama	Postmarked before Election Day and received by noon on Election Day.
Alaska	Election Day (presumably close of polls).
Arizona	7:00 p.m. Election Day.
Arkansas	7:30 p.m. Election Day.
California	Close of polls on Election Day.
Colorado	7:00 p.m. Election Day.
Connecticut	Close of polls on Election Day.
Delaware	Close of polls on Election Day.
D.C.	Election Day (presumably close of polls).
Florida	7:00 p.m. Election Day.
Georgia	Close of polls on Election Day.
Hawaii	Close of polls on Election Day.
Idaho	8:00 p.m. Election Day.
Illinois	Close of polls on Election Day.
Indiana	Noon on Election Day
Iowa	Close of polls on Election Day.
Kansas	Close of polls on Election Day.
Kentucky	6:00 p.m. Election Day.
Louisiana	4:30 p.m. November 2.
Maine	Close of polls on Election Day.
Maryland	Close of polls on Election Day.
Massachusetts	Close of polls on Election Day.
Michigan	8:00 p.m. Election Day.
Minnesota	Election Day (presumably close of polls).
Mississippi	Election Day (presumably close of polls).
Missouri	Close of polls on Election Day.
Montana	8:00 p.m. Election Day.
Nebraska	Close of polls on Election Day.
Nevada	Close of polls on Election Day.
New Hampshire	5:00 p.m. Election Day.
New Jersey	Close of polls on Election Day.
New Mexico	7:00 p.m. Election Day.
New York	Close of polls on Election Day.
North Carolina	5:00 p.m. on Election Day.
North Dakota	Election Day (presumably close of polls; may need to be postmarked before Election Day)
Ohio	Close of polls on Election Day.
Oklahoma	7:00 p.m. Election Day.
Oregon	8:00 p.m. Election Day.
Pennsylvania	8:00 p.m. Election Day.
Rhode Island	Close of polls on Election Day.

South Carolina	Close of polls on Election Day.
South Dakota	Close of polls on Election Day.
Tennessee	Close of polls on Election Day.
Texas	Close of polls on Election Day.
Utah	Election Day (presumably close of polls; may need to be postmarked before Election Day)
Vermont	Close of polls on Election Day.
Virginia	Close of polls on Election Day.
Washington	8:00 p.m. Election Day.
West Virginia	November 4.
Wisconsin	8:00 p.m. Election Day.
Wyoming	7:00 p.m. Election Day.

Table 2: State Postmarking Extension Return Deadlines as of October 23, 2020

State	Return Deadline
Alaska	November 13 (postmarked by Election Day).
California	November 20 (postmarked by Election Day).
District of Columbia	November 13 (postmarked by Election Day).
Illinois	November 17 (postmarked by Election Day).
Iowa	November 9 by noon or the time for canvass, if earlier (postmarked the day before Election Day).
Kansas	November 6 (postmarked by Election Day).
Kentucky	November 6 (postmarked by Election Day).
Maryland	November 13 by 10 a.m. (postmarked by Election Day).
Massachusetts	November 6 (postmarked by Election Day).
Minnesota	November 10 (postmarked by Election Day).
Mississippi	November 10 (postmarked by Election Day).
Nevada	November 10 5:00 p.m. (postmarked by Election Day) or November 6 (unpostmarked).
New Jersey	November 10 (postmarked by Election Day), or November 5 (unpostmarked).
New York	November 10 (postmarked by Election Day), or November 4 (unpostmarked).
North Carolina	November 12 by 5:00 p.m. (postmarked by Election Day).
North Dakota	November 9, in time for the county canvass (postmarked before Election Day).
Ohio	November 13 (postmarked before Election Day).
Pennsylvania	November 6 (postmarked by Election Day, or lacking a postmark).
Texas	November 4 by 5:00 p.m. (postmarked by Election Day).
Utah	November 10-17, depending on date of country canvass (postmarked before Election Day).
Virginia	November 6 by noon (postmarked by Election Day).
Washington	November 23 (postmarked by Election Day).
West Virginia	November 9 (postmarked by Election Day).