

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN
(DBP/USPS-536 THROUGH 544 AND 546 THROUGH 552)
(August 28, 2006)

The United States Postal Service hereby provides its institutional responses to the above-listed interrogatories, filed on August 14, 2006.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-536. Please refer to your response to Interrogatory DBP/USPS-374. Please confirm, or explain if you are unable to confirm, the only claim [beyond the refund of postage] that may be paid for the delay of Express Mail beyond its guaranteed delivery time is for document reconstruction and that the term documents is defined [as are the conditions for a document reconstruction claim] at the end of DMM Section 609.4.2.a.

RESPONSE:

Not confirmed. See DMM Section 609.4.3ae.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-537 Please refer to your response to Interrogatory DBP/USPS-376 subpart a. Please confirm, or explain if you are unable to confirm, that the guide that was attached to the Interrogatory response and Notice 3A referenced in response to Interrogatory DBP/USPS-11 do not provide any additional guidelines to postal acceptance clerks but only serve to take the appropriate DMM wording that already exists and place it in a convenient format.

RESPONSE

Not confirmed. The Notice 3A does more than place words in a convenient format.

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DBP/USPS-538 Please refer to your response to Interrogatory DBP/USPS-376 subpart b. [a] Please confirm, or explain if you are unable to confirm, that the uneven application of requirements is not a desirable condition.

[b] Please advise the steps that the Postal Service takes or is planning to take to correct this condition.

RESPONSE

- (a) Confirmed.
- (b) The dissemination of the materials referenced in the response already addresses the matter.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-539 Please refer to your response to Interrogatory DBP/USPS-377 subpart a. [a] Please confirm, or explain if you are unable to confirm, that if a mailer places an index card that measures 3 inches by 5 inches into a standard number 10 envelope that the thickness of the mailpiece will be uneven because the thickness of the mailpiece will be different in the place where the card is as opposed where the card is not and yet the mailpiece will not be charged the nonmachinable surcharge. [b] Please confirm, or explain if you are unable to confirm, that the nonmachinable surcharge will only apply if the uneven thickness is caused in a significant manner such as would be caused by placing an item such as a pen, pencil, or loose keys or coins in the envelope. [c] Please confirm, or explain if you are unable to confirm, that the difference between the scenario described in subpart a above and the scenario described in subpart b above is a subjective one and there are no guidelines other than the specific wording of the DMM to base that subjective decision on.

RESPONSE

- (a) It cannot be confirmed that every such piece will be perceptibly uneven. In any event, the surcharge will not apply.
- (b) Please see the response to DBP/USPS-377. This question has been previously asked and answered.
- (c) Not confirmed. The Subpart A Scenario involves so much objective common sense that there is no need to address it in a regulation.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-540 Please refer to your response to Interrogatory DBP/USPS-378. A standard 6- by 9-inch kraft envelope with a metal clasp will be charged the nonmachinable surcharge if it weighs less than one ounce under the provisions of DMM Section 101.1.2.c.

Is the rationale for the application of the surcharge based on:

[a] the unevenness of the mailpiece caused by the thickness of the physical clasp?

[b] the ability of the clasp to catch on something else during processing?

[c] the rigidity of the mailpiece caused by the metal clasp?

[d] If there is any other specific physical condition for the application of the surcharge, please specify.

RESPONSE

(a) DMM 101.1.2c does not address thickness. See DMM 101.1.2d and 2f.

(b) Yes.

(c) DMM 101.1.2c does not address rigidity. See DMM 101.1.2e.

(d) Depending on the mail piece, there are other criteria specified in DMM 101.1.2 that could trigger application of the surcharge.

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DBP/USPS-541 Please refer to your response to Interrogatory DBP/USPS-415.

[a] Please confirm, or explain if you are unable to confirm, that when either a customer or retail window clerk makes a measurement he/she will place the ruler up against the length that is being measured and observe the starting [usually the zero point] and ending point on the ruler to determine the length being measured.

[b] Please confirm, or explain if you are unable to confirm, that when measuring a boxshaped mailpiece it is usually possible to hold the ruler up against all three dimensions of the mailpiece and obtain a reasonably accurate measurement of the height, length, and width of the box-shaped mailpiece.

[c] Please confirm, or explain if you are unable to confirm, that when measuring an envelope it is usually possible to hold the ruler up against only the length and width of the mailpiece and thereby obtain a reasonably accurate measurement of only the length and width of the envelope.

[d] Please confirm, or explain if you are unable to confirm, that when utilizing an envelope as the enclosure for a mailpiece the maximum thickness of the mailpiece will occur at a point which is in the interior of the mailpiece, as opposed to along the edge such as would be if the mailpiece was a box, and therefore it will not be possible to place the ruler against the dimension being measured,

[e] Please confirm, or explain if you are unable to confirm, that when attempting to measure the thickness of an envelope using a ruler only, it will be necessary to hold the ruler perpendicular to the plane of the mailpiece and sight along the surface of the mailpiece and attempt to estimate the starting and ending points on the ruler of the maximum thickness of the mailpiece and then determine the measurement by subtracting those two observations.

[f] Please confirm, or explain if you are unable to confirm, that the measurement determined by the method described in subpart e above will be more of an estimate and will not be as accurate as the measurements obtained by the method described in subparts a through d above.

RESPONSE

- (a) That is a common approach.
- (b) That is usually the case.
- (c) That is usually the case.
- (d) That is often the case, but it is also often the case that the maximum thickness point will be so close to the edge as to make the fact that it is not absolutely, precisely smack dab on the edge meaningless for purposes of reliable and accurate measurement.

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RESPONSE to DBP/USPS-541 (continued):

- (e) Not confirmed that this is the only method. The mail piece can also be placed on flat surface and the ruler can be placed next to it on the same flat surface, so that the measurement starts at zero and no subtraction is necessary.
- (f) The Postal Service has no empirical basis for concluding that there is a meaningful degree of difference in accuracy of the two methods or that one is always more precise than the other.

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DBP/USPS-542 Please refer to your response to Interrogatory DBP/USPS-415.

[a] Please confirm, or explain if you are unable to confirm, that under the proposed shapebased First-Class Mail rates being proposed, it will be necessary to know which of the following range of thicknesses is the maximum thickness of a mailpiece falls into:

1. less than 0.25 inches
2. between 0.25 and 0.75 inches
3. over 0.75 inches

[b] Based on the responses to Interrogatory DBP/USPS-541 and to subpart a above, what methods will the retail window clerks be utilizing to determine the maximum thickness of a mailpiece so as to determine whether to apply the letter, flat, or parcel rates?

[c] Based on the responses to Interrogatory DBP/USPS-541 and to subpart a above, what methods will the majority of mailers be able to utilize to determine the maximum thickness of a mailpiece so as to determine whether to apply the letter, flat, or parcel rates?

RESPONSE

- (a) Confirmed.
- (b) They can be expected to use rulers and/or Notice 3As to measure the pieces.
- (c) They can measure the pieces using rulers, refer to the DMM, and rely on postal window clerks for assistance.

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DBP/USPS-543 Please refer to your response to Interrogatory DBP/USPS-415.

[a] Please confirm, or explain if you are unable to confirm, that the usual method of mailing sheets of 8-1/2- by 11-inch paper in a standard number 10 envelope is to fold the paper into thirds.

[b] Please confirm, or explain if you are unable to confirm, that normally four or five sheets of 8-1/2- by 11- inch paper in a standard number 10 envelope will be the limit for one ounce.

[c] Please confirm, or explain if you are unable to confirm, that standard folding [as opposed to "careless" folding] of four or five sheets of paper placed into a standard number 10 envelope will not cause the maximum thickness of the envelope to exceed 0.25 inches.

[d] Please confirm, or explain if you are unable to confirm, that under the present regulations once a First-Class Mail article exceeds one ounce its shape or thickness will be irrelevant [assuming that it does not exceed the 108-inch maximum length plus girth] to determining the necessary postage.

[e] Please confirm, or explain if you are unable to confirm, that under the proposed regulations there will be a financial incentive to place 8-1/2- by 11-inch sheets of paper into a standard number 10 envelope as opposed to placing unfolded into a 9- by 12-inch flat envelope.

[f] Please confirm, or explain if you are unable to confirm, that as a mailer increases the number of sheets of paper that he/she is attempting to place into a standard number 10 envelope it will require more care in folding and compressing the enclosure into the envelope and that even though the mailpiece has been compressed it will expand somewhat after the pressure has been removed.

[g] Please confirm, or explain if you are unable to confirm, that in placing sheets of 8-1/2-by 11-inch sheets of paper into a standard number 10 envelope it will be necessary to fold the paper and the mailer will apply pressure to the fold to compress the enclosure as much as possible before and after placing it into the envelope.

[h] Your response stated that, "Measurement should be made without compressing a mail piece". Please explain the difference between "without compressing" [by which you state the measurement should be made before] and folding the paper into thirds and applying pressure to the fold to compress the enclosure as much as possible [which is necessary to insert the paper into the envelope].

[i] Please discuss and reanswer the procedure to determine the thickness of a mailpiece as it relates to compression and expansion of the mailpiece.

RESPONSE

(a) The Postal Service confirms that that is a common method.

(b) The Postal Service confirms that that can be the case.

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RESPONSE to DBP/USPS-543 (continued):

- (c) The Postal Service lack sufficient information with which to know what, in *your* mind, differentiates “standard’ folding and “careless” folding to be able to answer this question. It is confirmed that different folding methods and techniques can produce different results. It is confirmed that four or five sheets of paper can be folded and inserted in an envelope in such a manner as to create a mail piece that does not exceed 0.25 inches in thickness.
- (d) Confirmed.
- (e) Some mailers who are indifferent to whether the contents of a mail piece are folded may view it that way. Others may not want the contents folded under any circumstances and will not consider that they have any financial incentive to fold.
- (f) Depending on the level of care taken with fewer sheets, it may not be necessary to take “more” care with more sheets. The Postal Service has not conducted studies on relative levels of folding care, compression and and expansion, as they may relate to the number of sheets in an envelope, to be able to respond to this interrogatory.
- (g) Not confirmed. Only a necessary amount of pressure is required. Application of “as much pressure as possible,” like many an interrogatory in this series, is unnecessary.

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RESPONSE to DBP/USPS-543 (continued):

(h-i) The common sense interpretation of the quoted response is that it refers to compression *after* the mail piece has been sealed. Accordingly, there is no need to explain any difference or to re-answer any question.

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DBP/USPS-544 Please refer to your response to Interrogatory DBP/USPS-415. Please refer to the last sentence of your response and explain how a postal service window clerk will be able to provide any assistance to resolve the scenarios referenced in Interrogatories DBP/USPS-541 to DBP/USPS-543.

RESPONSE

The clerk will expertly utilize available tools, measure the piece, assess postage, and communicate the assessment to a customer.

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DBP/USPS-546 Please explain the significance of including an eleven-page Motion of Douglas F. Carlson relating to DFC/USPS-RA-1 as pdf pages 144 through 154 of the Forever Stamp Library Reference USPS-LR-L-152 revised July 27, 2006.

RESPONSE

The obviously inadvertent inclusion of an irrelevant document in a Library Reference has as much significance as an interrogatory asking about an obviously inadvertent inclusion of an irrelevant document in a Library Reference -- none.

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DBP/USPS-547. Please refer to your response to Interrogatory DBP/USPS-366. Assume for purposes of this Interrogatory that the Forever Stamp regulations have been implemented as proposed and that the following omnibus rate case has been approved and implemented where the one-ounce First-Class Mail letter rate is 45¢ and the one-ounce flat rate is 65¢.

[a] May the mailer of a one-ounce First-Class Mail flat utilize a Forever Stamp [purchased when the First-Class Mail letter rate was 42¢] and a regular 20¢ postage stamp to fully pay the postage.

[b] If not, why not?

[c] May the mailer of a one-ounce First-Class Mail flat utilize a Forever Stamp [purchased when the First-Class Mail letter rate is 45¢] and a regular 20¢ postage stamp to fully pay the postage.

[d] If not, why not?

[e] Please explain how the mailer will be able to distinguish between the Forever Stamp utilized in the scenario described in subpart a above and the Forever Stamp utilized in the scenario described in subpart c above.

[f] Please explain how the Postal Service will be able to distinguish between the Forever Stamp utilized in the scenario described in subpart a above and the Forever Stamp utilized in the scenario described in subpart c above.

[g] Please confirm, or explain if you are unable to confirm, that mailer and Postal Service confusion will result from the policy involved in making your responses to the above subparts of this Interrogatory.

RESPONSE:

[a - f] Beyond the first rate cycle (from implementation of Docket No. R2006-1 rates until the next rate change), the Postal Service has not made a final determination about unintended postage applications, *i.e.*, applications other than single-piece First-Class Mail one-ounce letters. Please see the response to DBP/USPS-510[b].

[g] As stated in the response to DBP/USPS-510[b], the Postal Service will observe use of the Forever Stamp during the first rate cycle, and develop a policy for unintended applications such as the ones described in subparts [a] and [c] above. Minimizing potential mailer confusion will certainly be one of the Postal Service's objectives in this policy.

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DBP/USPS-548. Please refer to your response to Interrogatory DBP/USPS-368. Assume for purposes of this Interrogatory that the Forever Stamp regulations have been implemented as proposed and that the following omnibus rate case has been approved and implemented where the one-ounce First-Class Mail letter rate is 45¢ and the one-ounce parcel rate is \$1.10.

[a] May the mailer of a one-ounce First-Class Mail parcel utilize a Forever Stamp [purchased when the First-Class Mail letter rate was 42¢] and a regular 65¢ postage stamp to fully pay the postage.

[b] If not, why not?

[c] May the mailer of a one-ounce First-Class Mail parcel utilize a Forever Stamp [purchased when the First-Class Mail letter rate is 45¢] and a regular 65¢ postage stamp to fully pay the postage.

[d] If not, why not?

[e] May the mailer of a one-ounce First-Class Mail parcel utilize two Forever Stamps [purchased when the First-Class Mail letter rate was 42¢] and a regular 20¢ postage stamp to fully pay the postage.

[f] If not, why not?

[g] May the mailer of a one-ounce First-Class Mail parcel utilize two Forever Stamps [purchased when the First-Class Mail letter rate is 45¢] and a regular 20¢ postage stamp to fully pay the postage.

[h] If not, why not?

[i] Please explain how the mailer will be able to distinguish between the Forever Stamp utilized in the scenario described in subpart a above and/or the Forever Stamp utilized in the scenario described in subpart c above and/or the Forever Stamp utilized in the scenario described in subpart e above and/or the Forever Stamp utilized in the scenario described in subpart g above.

[j] Please explain how the Postal Service will be able to distinguish between the Forever Stamp utilized in the scenario described in subpart a above and/or the Forever Stamp utilized in the scenario described in subpart c above and/or the Forever Stamp utilized in the scenario described in subpart e above and/or the Forever Stamp utilized in the scenario described in subpart g above.

[k] Please confirm, or explain if you are unable to confirm, that mailer and Postal Service confusion will result from the policy involved in making your responses to the above subparts of this Interrogatory.

RESPONSE:

[a - j] Beyond the first rate cycle (from implementation of Docket No. R2006-1 rates until the next rate change), the Postal Service has not made a final determination about unintended postage applications, *i.e.*, applications other than single-piece First-Class Mail one-ounce letters. Please see the response to DBP/USPS-510[b].

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RESPONSE to DBP/USPS-548 (continued):

- [k] As stated in the response to DBP/USPS-510[b], the Postal Service will observe use of the Forever Stamp during the first rate cycle, and develop a policy for unintended applications such as the ones described in subparts [a], [c], [e] and [g] above. Minimizing potential mailer confusion will certainly be one of the Postal Service's objectives in this policy.

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DBP/USPS-549. Please refer to your response to Interrogatory DBP/USPS-367. Assume for purposes of this Interrogatory that the Forever Stamp regulations have been implemented as proposed and that the following omnibus rate case has been approved and implemented where the one-ounce First-Class Mail letter rate is 45¢ and the one-ounce flat rate [which is the rate also required for letters that have one or more nonmachinable characteristics] is 65¢. Further assume that a mailer deposits two, one-ounce First-Class Mail articles that require postage at the flat rate of postage [65¢] either because the piece exceeds the dimensions for a letter or the mailpiece has one of the non-machinable characteristics. One of the articles has the postage paid with a Forever Stamp [purchased when the First-Class Mail letter rate was 42¢] and the second article has the postage paid with a regular, denominated 45¢ stamp.

[a] Will both articles be treated in the same manner with respect to either being returned for additional postage and/or collection of postage due upon delivery?

[b] Please advise what action will be taken on each of these two mailpieces.

[c] Please provide the rationale for your responses to subparts a and b.

Now assume that a mailer deposits two, one-ounce First-Class Mail articles that require postage at the flat rate of postage [65¢] either because the piece exceeds the dimensions for a letter or the mailpiece has one of the non-machinable characteristics. One of the articles has the postage paid with a Forever Stamp [purchased when the First-Class Mail letter rate is 45¢] and the second article has the postage paid with a regular, denominated 45¢ stamp.

[d] Will both articles be treated in the same manner with respect to either being returned for additional postage and/or collection of postage due upon delivery?

[e] Please advise what action will be taken on each of these two mailpieces.

[f] Please provide the rationale for your responses to subparts a and b.

[g] Please explain how the mailer will be able to distinguish between the Forever Stamp utilized in the scenario described in subparts a/b/c above and the Forever Stamp utilized in the scenario described in subparts d/e/f above.

[h] Please explain how the Postal Service will be able to distinguish between the Forever Stamp utilized in the scenario described in subparts a/b/c above and the Forever Stamp utilized in the scenario described in subparts d/e/f above.

[i] Please confirm, or explain if you are unable to confirm, that mailer and Postal Service confusion will result from the policy involved in making your responses to the above subparts of this Interrogatory.

RESPONSE:

[a - h] Beyond the first rate cycle (from implementation of Docket No. R2006-1 rates until the next rate change), the Postal Service has not made a final determination about unintended postage applications, *i.e.*, applications other than single-piece First-Class Mail one-ounce letters. Please see the

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RESPONSE to DBP/USPS-549 (continued):

response to DBP/USPS-510[b]. To the extent that any pieces are shortpaid, assuming no changes in the DMM, section 604.8.1.1 would apply. Please see the response to DBP/USPS-316[a] - [c].

- [i] As stated in the response to DBP/USPS-510[b], the Postal Service will observe use of the Forever Stamp during the first rate cycle, and develop a policy for unintended applications such as First-Class Mail articles requiring postage at the rate for flats, as described above. Minimizing potential mailer confusion will certainly be one of the Postal Service's objectives in this policy.

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DBP/USPS-550. Please refer to your response to Interrogatory DBP/USPS-299. In Question 1a of the Small Business Version, the interview will be terminated if the person is not the one using the U.S. Postal Service for mailing and shipping needs. Please explain why this did not refer to the purchasing of stamps rather than mailing and shipping needs.

RESPONSE:

The survey targeted decision-makers about mailing and shipping needs, which includes purchasing stamps. Someone who simply purchases stamps may be doing so at another's direction.

DBP/USPS-551. Please refer to your response to Interrogatory DBP/USPS-299. In questions 18 through 24 and 29 through 30 of the Small Business Version and questions 18 through 24 of the Consumer Version, there were different scenarios supposed to be asked to different small business owners. What method was utilized to randomly assign different respondents to different groups?

RESPONSE:

The randomization is a built-in function of the CATI (Computer Assisted Telephone Interviewing) software which is produced by Computers for Marketing Corporation (CfMC).

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DBP/USPS-552. Please refer to your response to Interrogatory DBP/USPS-299. The instructions for Question 28 refer to "SKIP TO Q29", however, Question 29 does not appear in the Library Reference.

RESPONSE:

The last page of the consumer survey questionnaire, containing questions 29 and 30, is inadvertently missing in the Library Reference. The missing page is attached.

NO PREMIUM WITH LIMITATIONS

READ INTRODUCTION: The Postal Service may or may not charge a premium for the forever stamp. Please listen to these options and tell me which one you would prefer.

PROGRAMMER: ROTATE ORDER OF PRESENTATION SO 50% ARE ASKED Q 26 FIRST and 50% ARE ASKED Q27 FIRST.

PROGRAMMER: FOR Qs 28 and 29, INSERT FIRST PREMIUM THAT RESPONDENT WAS READ IN Q19/20 ROTATION. EXCEPTION: FOR "0" CENT PREMIUM, SAY "1" CENT PREMIUM. THEREFORE NO ONE WILL BE ASKED ABOUT "0" CENT PREMIUM. THE PREMIUMS TO BE TESTED ARE 1,3, and 6 cents.

29. Suppose the Postal Service offered a forever stamp with no premium or surcharge, so that the price would be the current rate for First-Class postage which is 39 cents, but the forever stamp would only be available for sale for two months before a rate change. Would you prefer to buy the forever stamp with no premium during the two months before a rate change or would you prefer to pay a [XX] cent(s) premium for the forever stamp and retain the ability to buy the forever stamp all year round?
- 1 PAY NO PREMIUM, BUY 2 MONTHS PRIOR
 - 2 PAY PREMIUM, BUY ALL YEAR
 - X DK/REF

READ BEFORE SECOND OPTION: Here is another option.

30. Suppose the Postal Service offered a forever stamp with no premium or surcharge so that the price would be at the current rate for First-Class postage which is 39 cents, but makes it available in a limited quantity, whereby you could only purchase 20 stamps or less at a time. Would you prefer to buy the forever stamp in limited quantities at 39 cents or would you prefer to pay a [XX] cents premium for the forever stamp and retain the ability to buy as many forever stamps as you desire?
- 1 PAY NO PREMIUM, BUY 20 OR LESS AT A TIME
 - 2 PAY PREMIUM, BUY AS MANY STAMPS AS DESIRED
 - X DK/REF

CONTINUE WITH NEXT CARAVAN SECTION