

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KELLEY
(USPS-T-30) TO INTERROGATORIES OF VALPAK (VP/USPS-T44-27 - 29),
REDIRECTED FROM WITNESS COOMBS
(July 24, 2006)

The United States Postal Service hereby provides the response of witness Kelley (USPS-T-30) to the following interrogatories of ValPak, Inc., filed on July 10, 2006: VP/USPS-T44-27 – 29, redirected from witness Coombs.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 24, 2006

**Responses of Postal Service Witness Kelley (USPS-T-30) to Interrogatories
Posed by Valpak, Dealers Association, Inc., Redirected from Witness
Coombs**

VP/USPS-T44-27.

For saturation mailings sent to rural routes in FY 2005, what proportion used simplified addresses?

Response

This figure is unavailable. My understanding is that RCCS does not record information about the number of saturation mailings. RCCS records mail volume by compensation category. Pieces with simplified addresses or no address (e.g. host pieces of DAL mailing) are recorded as 'Boxholder'. In USPS-LR-L-67, 'Boxholder volume is distributed to rate categories in the same proportion as RPW. Three percent of DALs delivered on rural routes are assumed to use simplified addresses and, as a result, are included with ECR Saturation 'Boxholder' volume.

**Responses of Postal Service Witness Kelley (USPS-T-30) to Interrogatories
Posed by Valpak, Dealers Association, Inc., Redirected from Witness
Coombs**

VP/USPS-T44-28.

Please confirm that non-federal government agency mailers may not use simplified address on any city routes.

Response

Not confirmed. It appears that official matter mailed by State (including District of Columbia and Puerto Rico) and local governments can use simplified addresses on city routes. The specific requirements are contained in section 602.3.2.2 of the DMM.

**Responses of Postal Service Witness Kelley (USPS-T-30) to Interrogatories
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VP/USPS-T44-29.

Please refer to the response of witness Kelley (USPS-T-30) to NAA/USPS-T30-5(a) and explain how the “Deceptive Mail Prevention and Enforcement Act, Public Law 106-168, amending 39 U.S.C. § 3001,” restricts the use of simplified addresses.

Response

Public Law 106-168, amending 39 U.S.C. § 3001, imposes obligations on companies sending sweepstakes and skill contests materials through the mail. The statute requires the companies to adopt reasonable practices and procedures to prevent the mailing of these materials to any person, who by virtue of written request, declares their intent to not receive such mailings. Although the law may not expressly limit the use of simplified addresses, it is my understanding that mailers apparently feel that the risk of non-compliance is reduced if they avoid the use of simplified addresses. The Postal Service has not determined what other approaches may be feasible to assist mailers to meet their obligations under this law.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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