

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

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POSTAL RATE AND FEE CHANGES, 2000)

Mar 16 3 46 PM '00
Docket No. R2000-1

VAL-PAK DIRECT MARKETING SYSTEMS, INC.,
VAL-PAK DEALERS' ASSOCIATION, INC., AND
CAROL WRIGHT PROMOTIONS, INC
FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS LINDA A. KINGSLEY (VP-CW/USPS-T10-1-8)
(March 16, 2000)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Val-Pak Direct Marketing Systems, Inc., Val-Pak Dealers' Association, Inc., and Carol Wright Promotions, Inc., hereby submit interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

Respectfully submitted,



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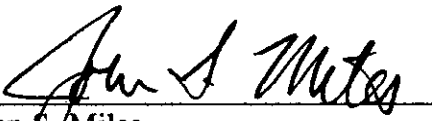
Val-Pak Direct Marketing Systems, Inc.,

Val-Pak Dealers' Association, Inc., and

Carol Wright Promotions, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.


John S. Miles

March 16, 2000

VP-CW/USPS-T10-1.

This question pertains to ECR Saturation mailings with detached address labels (“DALs”).

- a. Must DALs have a postnet barcode?
- b. If not, does the Postal Service ever run DALs through Optical Character Reader (“OCR”) equipment to add a postnet barcode? If so, under what circumstances?
- c. When the mailing is to a rural route area where letter mail routinely is prepared on Delivery Point Sequencing (“DPS”) equipment,
 - (i) Are there any areas or circumstances where the DALs would be sorted on DPS equipment?
 - (ii) Would the DALs be sorted on DPS equipment if the mail were entered at the DBMC or the DSCF?
 - (iii) If the mail were entered at the DDU, are there any areas or circumstances where the DALs would be transported back to the plant and sorted on DPS equipment?
- d. When the mailing is to a city delivery route area where letter mail routinely is prepared on Delivery Point Sequencing (“DPS”) equipment,
 - (i) Are there any areas or circumstances where the DALs would be sorted on DPS equipment?
 - (ii) Would the DALs be sorted on DPS equipment if the mail were entered at the DBMC or the DSCF?

- (iii) If the mail were entered at the DDU, are there any areas or circumstances where the DALs would be transported back to the plant and sorted on DPS equipment?
- e. At all DDUs where DALs are not presorted on DPS equipment, do carriers always case the DALs, or do circumstances exist where a carrier would take the both DALs (uncased) and the mail which goes with the DALs directly to the carrier's vehicle?
- f. Please describe all in-office procedures used for DALs that are not presorted with letter mail, compare the procedures for handling DALs versus those for handling saturation enveloped letter mail (*e.g.*, to the same addresses as the DALs), and indicate which is easier and less costly for the Postal Service to process and deliver.

VP-CW/USPS-T10-2.

When carriers deliver a DAL mailing, do they put both the detached address label and the mailpiece in the addressee's mail receptacle, or do they put only the mailpiece in the receptacle? If the Postal Service has no standard operating procedure, please indicate what you believe to be the prevailing practice.

VP-CW/USPS-T10-3.

Assume that a carrier receives two ECR saturation mailings for delivery, for example, on Tuesday.

- a. Would the carrier case one mailing and take the other as a third bundle, or would the carrier take one as a third bundle and defer the other until the next delivery day? Which would be most likely to occur?
- b. If one of the two saturation mailings were DAL, and the other were an enveloped addressed mailpiece, would the carrier be most likely to case the addressed enveloped mailpieces or the DALs?

VP-CW/USPS-T10-4.

Is it operationally easier for the Postal Service to process and deliver (i) ECR saturation mail that is enveloped and has a preprinted postnet barcode, or (ii) ECR saturation mail that has a DAL and is “loose,” or folded and not enveloped?

VP-CW/USPS-T10-5.

Please describe and compare the processing of (i) ECR saturation letter mail with a postnet barcode with (ii) ECR saturation flat mail (no barcode) both (a) in the current mail processing environment and (b) in the future “automated” flats environment when the Postal Service has the ability to DPS flat mail.

VP-CW/USPS-T10-6.

- a. When a carrier receives an ECR saturation DAL mailing, does the carrier count the number of detached labels and then count the number of mailpieces needed to make complete delivery?

- b. If not, how does the carrier make certain that the number of mailpieces equals or exceeds the number of detached labels?
- c. What happens if the carrier has fewer mailpieces than DALs (*i.e.*, the carrier runs out of mailpieces before completing the route)? For example, does the carrier return to the office with the remaining DALs and, assuming that the office still has sufficient mailpieces, complete delivery the following day?
- d. What happens if the carrier takes on the route more mailpieces than DALs (*i.e.*, upon completing the route, the carrier has some mailpieces left over)? Does the carrier return the extra mailpieces to the office, or are they discarded?

VP-CW/USPS-T10-7.

When the Postal Service receives an ECR saturation DAL mailing where the mailpiece is folded and loose (*i.e.*, un-tabbed), has dimensions of 5.75 inches by 10.5 inches, and weighs 3.0 ounces, does such mail pay the letter rate or the flat rate?

VP-CW/USPS-T10-8.

- a. Please explain the acceptance and verification procedures for ECR saturation DAL mailings.
- b. Does the acceptance clerk count both the DALs and the mailpieces, or just the DALs?
- c. If the number of mailpieces exceeds the DALs, is the rate based on the number of DALs or the number of mailpieces?