

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

POSTAL RATE AND FEE CHANGES, 2000 )

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Docket No. R2000-1  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

VAL-PAK DIRECT MARKETING SYSTEMS, INC.,  
VAL-PAK DEALERS' ASSOCIATION, INC., AND  
CAROL WRIGHT PROMOTIONS, INC  
SECOND INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS LINDA A. KINGSLEY (VP-CW/USPS-T10-9-12)  
(March 23, 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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Counsel for:

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.

  
William J. Olson

March 23, 2000

**VP-CW/USPS-T10-9.**

Please refer to your response to NAA/USPS-T10-13.

- a. Are detached address labels (“DALs”) handled as letters or flats in city delivery?
- b. Are DALs handled as letters or flats in rural delivery?

**VP-CW/USPS-T10-10.**

Please refer to your testimony at page 9 (ll. 5-8), where you speak of delivery units and plants working together “to identify and capture Enhanced Carrier Route (ECR) letter bundles and trays to incorporate these pieces into the carriers’ DPS mail, thus eliminating the need for manual casing.”

- a. Are DALs for saturation mailings included in this discussion of ECR letters?
- b. Are there efforts to eliminate manual casing of DALs?

**VP-CW/USPS-T10-11.**

Please refer to your response to NAA/USPS-T10-14.

- a. Under what circumstances would a carrier not case DALs?
- b. In what percentage of DAL mailings are the DALs manually cased?
- c. In what percentage of DAL mailings are the associated mailpieces manually cased?

- d. Describe the different ways in which the associated saturation mailpiece could be handled, and how they vary by (i) whether the route is DPS, and (ii) DPS work method.

**VP-CW/USPS-T10-12.**

Can ECR parcels in a DAL mailing qualify as automated flats, if between 0.75 and 1.25 inches thick?