

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS CRUM TO INTERROGATORY OF
VAL-PAK, ET AL.
(VP-CW/USPS-T27-1)

The United States Postal Service hereby provides the responses of witness Crum to the following interrogatory of Val-Pak Direct Marketing Systems, Inc., Val-Pak Dealers Association, Inc., and Carol Wright Promotions, Inc.: VP-CW/USPS-T27-1, filed on March 15, 2000.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

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March 29, 2000

**U.S. POSTAL SERVICE WITNESS CHARLES L. CRUM
RESPONSE TO INTERROGATORY
OF VAL-PAK, et. al.**

VP-CW/USPS-T27-1.

Please refer to your response to PSA/USPS-T27-5(a), where you assert that "Also, [all] ECR parcels require a detached label card."

- a. Please cite section(s) of the DMM on which you rely for your above-quoted statement.
- b. Please refer to DMM Section A060, Detached Address Labels ("DALs"), subsection 1.3, Standard Mail (A) Merchandise Samples, and confirm that this section of the DMM does not require that all ECR parcels require a DAL. If you do not confirm, please explain fully.

RESPONSE

- a. Please refer to DMM section C600.1.1d. It is my understanding that ECR pieces exceeding the maximum ECR flat shape dimensions must be mailed with a DAL.
- b. It is my understanding that although DMM section A060 does not explicitly say "all ECR parcels require a DAL", it does, in conjunction with DMM section C600.1.1d, effectively result in a requirement that all ECR parcels be mailed with a DAL. DMM section A060 1.3 says "Merchandise samples more than 5 inches wide (high) or 1/4 inch thick, or nonuniform in thickness, mailed at bulk Standard Mail (A) rates, must be mailed with DALs when prepared for general distribution on city delivery routes." Parcel-shaped merchandise samples (the only parcels allowed in ECR) would exceed the maximum thickness in the quoted section presented here and therefore require a DAL.

DECLARATION

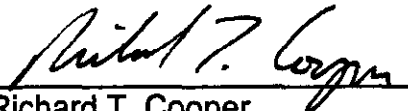
I, Charles L. Crum, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.


CHARLES L. CRUM

Dated: 29 MARCH 2000

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.


Richard T. Cooper

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