

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

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POSTAL RATE AND FEE CHANGES, 2001)

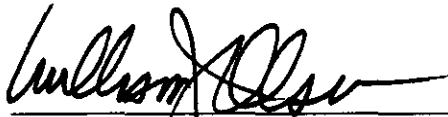
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R2001-1

VAL-PAK DIRECT MARKETING SYSTEMS, INC.
AND VAL-PAK DEALERS' ASSOCIATION, INC.
FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS LARAIN B. HOPE (VP/USPS-T31-1-8)

(October 2, 2001)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Val-Pak Direct Marketing Systems, Inc. and Val-Pak Dealers' Association, 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. and
Val-Pak Dealers' Association, 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

October 2, 2001

VP/USPS-T31-1

May Detached Address Labels (“DALs”) be used with enveloped Standard ECR flats?

VP/USPS-T31-2.

- a. For pieces known as “wraps,” what are the minimum dimensions for the outer host piece in a Standard ECR DAL flat mailing?
- b. What terminology is used to describe such pieces (i) in the DMM, and (ii) conversationally ?
- c. What provisions in the DMM describe or govern such pieces?
- d. Can the dimensions of inserts exceed the dimensions of the host piece? If so, (i) by how much and (ii) what determines the dimension of the entire mailpiece?

VP/USPS-T31-3.

- a. In a Standard ECR DAL flat mailing consisting of wraps, is there any limit on the number of inserts contained within a host piece? If so, what is that limit?
- b. In a Standard ECR DAL flat mailing consisting of wraps, are there any limitations on the thickness, nature, form, or content of the inserts contained within a host piece? If so, what are those limitations?
- c. Are there any minimum dimensions for inserts within a host piece?
- d. May an insert consist of an enveloped letter?
- e. May an insert consist of an enveloped flat?

VP/USPS-T31-4.

Do local acceptance clerks verify DALs prepared with flats to ensure that they meet applicable mail processing category requirements as presented by the mailer?

VP/USPS-T31-5.

In a flat-shaped Standard ECR DAL mailing consisting of wraps, what are the minimum dimensions of the host piece?

VP/USPS-T31-6.

Do acceptance clerks ever collect additional postage (surcharge) or disqualify a mailing for exceeding the maximum flat dimensions? Please explain.

VP/USPS-T31-7.

Your testimony at page 9, lines 15-17 states that Standard ECR High Density and Saturation letters must bear delivery point barcodes and meet other Postal Service requirements for automation compatibility.

- a. Will High Density and Saturation Standard ECR letters be required to pass the MERLIN test?
- b. Aside from MERLIN, what other requirements must such letters meet in order to qualify for your proposed Standard ECR letter rates?

VP/USPS-T31-8

Your testimony at page 13 states that “[i]f a goal of rate design were to have equal implicit coverage....”

- a. In your opinion, to what extent is a rate design goal of equal implicit coverage appropriate?
- b. Under what conditions or circumstances is a rate design goal of equal implicit coverage either inappropriate or ripe for being over-ridden by other considerations?
- c. Please state clearly whether it is your goal, or the Postal Service’s goal, to have equal implicit coverage for lighter weight and heavier weight pieces within Standard ECR.
- d. Within the Standard ECR subclass, for your proposed rates, what is the implicit coverage for (i) letters, (ii) flats and (iii) parcels?
- e. Within the Standard ECR subclass, for your proposed rates, what is the implicit coverage for (i) Basic, (ii) High Density and (iii) Saturation letters?
- f. Within the Standard ECR subclass, for your proposed rates, what is the implicit coverage for (i) Basic, (ii) High Density and (iii) Saturation flats?
- g. Within the Standard ECR flat-shaped mailstream, for your proposed rates, what is the implicit coverage for (i) piece-rated flats, and (ii) pound-rated flats?