

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

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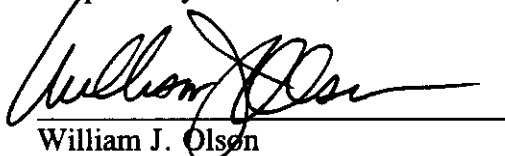
POSTAL RATE AND FEE CHANGES, 2001)

POSTAL RATE COMMISSION
Docket No. SR-2001-1

VAL-PAK DIRECT MARKETING SYSTEMS, INC.
AND VAL-PAK DEALERS' ASSOCIATION, INC.
SECOND INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS LINDA A. KINGLSEY (VP/USPS-T39-24-38)
(October 12, 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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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 12, 2001

VP/USPS-T39-24.

Detached Address Label (“DAL”) mailings involve the delivery of two mailpieces (one being a flat or parcel, the other being the address card) for a single rate, as though they constituted a single mailpiece.

- a. Does the address card receive different handling by the carrier than the flat/parcel? Please explain how each constituent part of the DAL mailpiece is handled at a Destination Delivery Unit (“DDU”).
- b. Does the address card receive different handling at the Destination Sectional Center Facility (“DSCF”) than the flat/parcel? Please explain how each constituent part of the DAL mailpiece is handled at an DSCF.
- c. Does the address card receive different handling at a Destination Bulk Mail Center (“DBMC”) than the flat/parcel? Please explain how each constituent part of the DAL mailpiece is handled at a DBMC.
- d. If your answers to parts a through c reflect any difference in handling, why does it make sense to treat the address card and flat/parcel as a single mailpiece?
- e. In Docket No. R2000-1, Postal Service witness Moeller (USPS-T-35) observed that “it seems illogical that the Postal Service would be that indifferent between processing and delivering two 4-ounce pieces and one 8-ounce piece.” (USPS-T-35, p. 21 (Revised 4/3/2000), l. 17 through p. 22, l. 1.)
 - (i) Do you agree with his analysis? Please explain your answer.

- (ii) Does it strike you as illogical that the Postal Service would be indifferent between processing and delivering an addressed flat, and processing and delivering a flat with a DAL? Please explain your answer.

VP/USPS-T39-25.

- a. For all classes of mail, what types of mailings must include DALs?
- b. For all classes of mail, what types of mailings may include DALs?

VP/USPS-T39-26.

- a. Does it ever happen that written notification of a DAL mailing is not received at least 10 days before the target delivery date? How is the mailing handled in such instances?
- b. Does it ever happen that the letter providing notice of a DAL mailing is missing some of the required information? How is the mailing handled in such instances?
- c. Does it ever happen that a DAL mailing is received and no copy of the letter has been enclosed with the DALs when presented for delivery, nor do the initial notice and the cartons used for the DALs and items bear a mailing identification number? How is the mailing handled in such instances?
- d. Does it ever happen that a carton of DALs lacks either a mailing identification number or a label showing the required information? How is the mailing handled in such instances?

VP/USPS-T39-27.

How are DALs and accompanying mailpieces delivered in each type of city carrier route:

- a. Curbline?
- b. Dismount?
- c. Park and loop with a composite DPS work method?
- d. Park and loop in a non-DPS environment?
- e. Foot with a composite DPS work method?
- f. Foot in a non-DPS environment?

VP/USPS-T39-28.

- a. How are DALs and associated mailpieces handled, cased, carried, and delivered on rural carrier routes?
- b. Please describe how rural carriers are compensated for handling and delivering DALs and accompanying flats and parcels. Are they compensated for one or two pieces?
- c. Please describe how rural carriers are compensated for handling and delivering ECR flats without DALs.
- d. Is the compensation that rural carriers receive for handling flats without DALs equal to the compensation they receive for handling flats with DALs? If not, please explain all differences.

VP/USPS-T39-29.

- a. Do carriers count the address cards and accompanying mailpieces to ensure that there is a mailpiece for each accompanying card? If not, how do carriers ensure that they have the correct number of both parts of a DAL mailing?
- b. What happens if the carrier does not have enough accompanying mailpieces?
- c. What happens if the DDU does not have enough accompanying mailpieces?
- d. Is there a date after which a mailer's response to rectify a problem with a DAL mailing is no longer timely? What happens in such cases?

VP/USPS-T39-30.

Would you agree that it is easier to distinguish a DAL mailing from other ECR mailings than it is to distinguish the average ECR flat mailing from the average ECR parcel mailing? Please explain your answer.

VP/USPS-T39-31.

- a. Does the Postal Service allow letter-shaped mail to be accompanied by DALs?
If not, why not?
- b. Does the Postal Service allow enveloped flats to be accompanied by DALs? If not, why not?
- c. Does the Postal Service allow unaddressed catalogs to be accompanied by DALs? If not, why not?

VP/USPS-T39-32.

The following assumptions involve a hypothetical. First, assume that on some particular day a DDU has two Standard ECR Saturation flat mailings to deliver, along with the usual assortment of other mail. Second, the mail for delivery that day is normal, and carriers will have no problem delivering both of the two Saturation mailings. Third, carriers in this DDU can take one of the two Saturation mailings to the street as a third bundle. Fourth, the two mailings are catalogs having the same dimensions (length and height), but differing with respect to weight as follows: one of the two Saturation mailings is a catalog weighing 2.8 ounces, and the other is a catalog weighing 5.5 ounces.

- a. Of the two Saturation flat mailings, is either more likely to be taken to the route as a third bundle, or would each one have an equal probability of being taken?
- b. Has the Postal Service issued any written instructions establishing the order or priority for implementing the third bundle option? If so, please provide a copy of all applicable instructions (i) that were in effect during the Base Year and (ii) that are now in effect.
- c. If the Postal Service has not issued any written instructions establishing the order or priority for implementing the third bundle option, do DDUs have any general instructions or understanding concerning the priority? If so, please provide a copy.

VP/USPS-T39-33.

In Base Year 2000, what was the average number of households served by a city carrier

(i) in areas where all of the carrier's automatable letter mail was Delivery Point Sequenced ("DPS'd"), and (ii) in areas where none of the carrier's letter mail was DPS'd; *i.e.*, all mail had to be sequenced manually?

VP/USPS-T39-34.

- a. In Base Year 2000, what was the average volume of mail per household served by a city carrier?
- b. In Base Year 2000, what was the average weight of mail per household served by a city carrier?

VP/USPS-T39-35.

- a. What is the maximum weight of mail that a carrier is permitted to carry in a shoulder satchel when walking a route?
- b. What is the maximum weight of mail that a carrier is permitted to load into a caddy when walking urban routes?

VP/USPS-T39-36.

- a. On park and loop routes, do carriers sometimes have more mail to deliver on a foot loop than they can load into their satchels? That is, do they sometimes

have to return to their vehicle to reload their satchels before delivering to all the points served from one parking spot?

- b. If the answer to preceding part a is anything other than an unqualified negative, please discuss the frequency with which time must be taken to return to the vehicle for reloading the satchel and then returning to the foot portion of the route.

VP/USPS-T39-37.

- a. On city carrier curb routes, where carriers normally do not dismount except to deliver parcels and accountable mail, on average how often must a carrier stop the vehicle and take time to rearrange the remaining mail in the vehicle for delivery to the rest of the route (*e.g.*, refresh the letter and flat trays next to the driver)?
- b. How would the time required to rearrange the remaining mail in the vehicle for delivery be classified under the existing system for classifying city carrier street time; *i.e.*, as route time, or access time, or load time, etc.?
- c. Please provide a brief description of all recurring activities that take place on a city carrier's route that do not fit naturally into the existing system for classifying city carrier street time; *i.e.*, as route time, or access time, or load time, etc.

VP/USPS-T39-38.

When the Postal Service develops the ability to DPS flats, approximately how many households or delivery points, on average, does the Postal Service expect that a single city carrier will be able to serve on a single route, assuming that all automatable letter and flat mail is DPS'd?