

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

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Docket No. R2001-1
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001)

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 THOMAS W. HARAUSH (VP/USPS-T5-1-6)
(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,

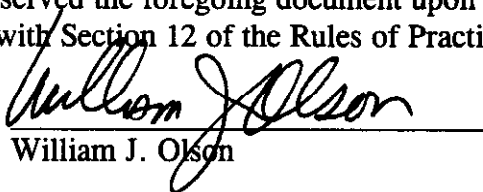


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CERTIFICATE OF SERVICE

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-T5-1.

According to the cover sheet for LR-J-14, Handbook F-65, the March 1999 Data Collection User's Guide for Cost Systems, "Chapters 3 and 4 are the subjects of witness Harahush, USPS-T-5." Section 3.2.1.10 of this Handbook F-65 states that: "If the mailing consists of a detached label with a mailing sample, count the two pieces as one saturation mailing but record the pieces separately when counting mail for the stop."

- a. Does this treatment of DAL mailings only apply to saturation mailings? If so, how are DAL mailings which are not saturation mailings recorded?
- b. What is the significance of counting the two pieces as a single saturation mailing? How are the data regarding the number of saturation mailings used by the Postal Service?
- c. What is the significance of counting the two pieces separately when counting mail for the stop? How are the data regarding the number of mail pieces per stop used by the Postal Service?

VP/USPS-T5-2.

Section 4.1.1.2 of Handbook F-65 states: "Make sure that you know how to distinguish between letters and flats and between flats and parcels. You can find definitions for the various compensation categories in RM 4-08. Unlike in the City Carrier test, you must make these distinctions based on the measurements of the mailpieces rather than on the way the carrier cases the mailpieces." Likewise, Section 1.2 of the handbook states "In the city test you count

mail according to how it is cased, but in the rural test you count it according to its measurements.”

- a. Does this mean that, when a City Carrier Route Test is conducted, the identification of a mailpiece as a letter, or flat, or parcel, is based upon the way the carrier cases the mailpieces, rather than on the dimensions of the mailpiece? Please explain your answer.
- b. Why does the city carrier route test use a method of defining a mailpiece’s shape that is different from the rural carrier route test?

VP/USPS-T5-3.

Section 4.2.4.8 of Handbook F-65 states:

Recording Detached Address Labels (DALs)/Cards. This applies to a variety of rates of mail. Record class, subclass, and compensation category for detached address labels accompanying a product or host-piece by examining the markings to determine the proper class and subclass. The address format determines compensation category. If the DAL has a simplified address, then use “Boxholder” as the compensation category. If the DAL has occupant (postal customer, occupant, householder, or resident and a specific address) or exceptional (“Jane Doe or current resident” and a specific address) address format, use the proper type of letter as the compensation category.

- a. For rural carriers, why does the address format determine the compensation category for a DAL mailing?
- b. Does the address format determine the compensation category for both the DAL and the accompanying mailpiece?

- c. Please identify all of the compensation categories for which a DAL may qualify under this section, and the corresponding compensation to a rural carrier for a DAL and accompanying mailpiece.
- d. For the calculation of rural carrier compensation, are the DAL and accompanying mailpiece treated as two mailpieces?

VP/USPS-T5-4.

- a. On park and loop routes, do carriers sometimes have more mail to deliver than they can load into their satchel? That is, do they sometimes have to return to their vehicle to reload their satchel 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, is the time spent reloading the satchel captured by the city carrier route test? If so, how? If not, why not?

VP/USPS-T5-5.

- a. On city carrier curb routes, do carriers 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. If the answer to preceding part a is anything other than an unqualified negative, is the time spent rearranging the remaining mail for delivery captured by the city carrier route test? If so, how is it recorded? If not, why not?
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VP/USPS-T5-6.

- a. On rural carrier routes, do carriers 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. If the answer to preceding part a is anything other than an unqualified negative, is the time spent rearranging the remaining mail for delivery captured by the rural carrier route test (see LR-J-14, Handbook F-65, the March 1999 Data Collection User's Guide for Cost Systems, Section 1.2)? If so, how? If not, why not?