

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS HUNTER TO INTERROGATORIES OF VAL-PAK
VP/USPS-T4-1-3

The United States Postal Service hereby provides the responses of witness Hunter to the following interrogatories of Val-Pak, VP/USPS-T4-1-3, filed on October 2, 2001.

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

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October 16, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HUNTER
TO INTERROGATORY OF VAL-PAK

VP/USPS-T4-1.

- a. Does Postal Service Form 3602 distinguish between (i) Standard ECR flats with Detached Address Labels (“DALs”) and (ii) other Standard ECR flats?
- b. Does Form 3602 distinguish between Standard parcels with DALs and other Standard parcels?
- c. Does Form 3602 distinguish between Bound Printed Matter (“BPM”) with DALs and other BPM?
- d. If the answers to preceding parts a, b, or c are anything other than an unqualified affirmative, please explain fully what information about DAL mailings can be ascertained from Form 3602.
- e. If prior versions of Form 3602 contained such information, please describe.
- f. If other Postal Service forms contain such information, please describe.

RESPONSE.

- a-b. No. The level of detail necessary to compute postage on PS Form 3602 for Standard Mail parcel and ECR flat mailings does not require DAL mailpiece characteristic information.
- c. No. To respond to this question, it is assumed that PS Form 3605 is of interest and not PS Form 3602, which applies only to Standard Mail mailings. The level of detail necessary to compute postage on PS Form 3605 for BPM mailings does not require DAL mailpiece characteristic information.
- d. PS Forms 3602 and 3605 do not identify DAL revenue, volume, and weight information for Standard Mail parcel, ECR flat, and BPM mailings. The intent of these forms is to compute postage by rate category. Since DAL is not a rate category, these forms do not describe DAL mailings.
- e. Prior versions of PS Forms 3602 and 3605 do not identify DAL revenue and volume information. See also my response to part (d).

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- f. My response to this question is based on discussions with other postal officials. I am not aware that the requested DAL information is collected.

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VP/USPS-T4-2.

- a. Of all Standard ECR flats that were entered during Base Year, what was the volume of unaddressed flats mailed with (i.e., accompanied by) DALs?
- b. Of the volume provided in response to part a, what was the volume of flats with DALs that were entered at the minimum piece rate?
- c. Of the volume provided in response to part a, what was the volume of flats with DALs that were entered at the pound rate?

RESPONSE.

Please see my response to VP/USPS-T4-1(d).

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HUNTER
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VP/USPS-T4-3.

- a. Please state the average weight of Standard ECR flats that were mailed with DALs during Base Year at the minimum piece rate.
- b. Please state the average weight of Standard ECR flats that were mailed with DALs during Base Year at the pound rate.
- c. Please supply all sources for the data provided in response to preceding parts a and b.

RESPONSE. Please see my response to VP/USPS-T4-1(d).

DECLARATION

I, Herbert B. Hunter, III, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Herbert B. Hunter, III

Dated: _____

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.

Kenneth N. Hollies

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