

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

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

POSTAL RATE AND FEE CHANGES, 2001 )

VAL-PAK DIRECT MARKETING SYSTEMS, INC.  
AND VAL-PAK DEALERS' ASSOCIATION, INC.  
THIRD INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS LINDA A. KINGSLEY (VP/USPS-T39-39-50)  
(October 24, 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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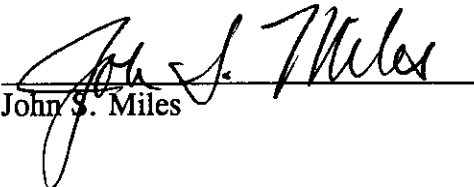
Counsel for:

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.



John S. Miles

October 24, 2001

**VP/USPS-T39-39.**

- a. Please provide the total number of city carrier routes in Base Year 2000.
- b. For Base Year 2000, please provide a breakdown of city carrier routes by route type (*e.g.*, foot, park & loop, curb, mixed, etc.).
- c. Please provide the total number of city carrier routes projected for Test Year 2003.
- d. For Test Year 2003, please provide a projected breakdown of city carrier routes by route type (*e.g.*, foot, park & loop, curb, mixed, etc.).

**VP/USPS-T39-40.**

Please refer to the response to VP/USPS-T39-9. That response states that “two unaddressed flat mailings would be collated and handled as a third bundle.” (The response to VP/USPS-T39-10 also discusses collation.)

- a. Please describe the collation process. That is, (i) would carriers intersperse the two bundles of unaddressed items on a table or other flat surface, (ii) would they intersperse them into an empty vertical flat case, or (iii) would they use some other procedure?
- b. How does the rate at which two unaddressed flat mailings can be collated compare with the rate at which addressed saturation flat mailings can be cased in vertical flat cases (as described in the response to VP/USPS-T39-5(c))?

**VP/USPS-T39-41.**

The response to VP/USPS-T39-12 states that unaddressed flats are very rarely cased (by city carriers), but when such casing does occur the DAL is also cased with the flat. The response to VP/USPS-T39-16 states that in rural delivery the carrier can elect either to case all pieces of a shared mailing or to case the DAL and carry the accompanying piece as an extra bundle. The response to VP/USPS-T39-17 states that the only applicable standard for unaddressed wraps is 8 pieces per minute. Based on general experience, when city or rural carriers do case unaddressed flat “wraps,” how does the rate at which such wraps are cased compare with the rate at which addressed saturation flat mailings can be cased in vertical flat cases (as described in the response to VP/USPS-T39-5(c))?

**VP/USPS-T39-42.**

Refer to the response to VP/USPS-T39-16. The response to part a indicates that casing of “wraps” by a city carrier would be very rare, and the response to part b states that city carriers would be allowed or instructed to case “wraps” accompanying DALs only in the most extreme delayed mail situations.

- a. Is it reasonable to infer from this response that the Postal Service considers the casing of “wraps” to be a low priority, or less desirable, activity for city carriers? Please explain any negative answer.
- b. Please explain all reasons why the Postal Service considers the casing of “wraps” to be a low priority or less desirable activity for city carriers.

**VP/USPS-T39-43.**

The response to VP/USPS-T39-6 states that on mounted routes carriers can take a tray of walk sequenced DALs directly to the vehicle without casing. The response to VP/USPS-T39-8 and 9 states that there is no limitation on the number of bundles a mounted carrier can handle.

- a. For city carriers on curblin routes, how many separate trays or "bundles" can the carrier accommodate within arm's reach in a typical Postal Service vehicle supplied to city carriers? That is, how many separate trays or bundles can a mounted carrier handle at a curbside stop without leaving the seat.
- b. For rural carriers that use their own vehicles, how many separate "bundles" can the carrier accommodate within arm's reach in a typical vehicle used by rural carriers?

**VP/USPS-T39-44.**

As a hypothetical, assume that a city carrier on a curblin route had only one Standard ECR saturation mailing to deliver on a particular day (along with the normal volume of other mail), and that mailing consisted of letter-shaped mail presorted by line of travel ("LOT").

- a. Does the Postal Service have in place a standard policy or procedure that prescribes how city carrier should handle letter-shaped Standard ECR saturation mailings under such circumstances?
- b. If your answer to preceding part a is the affirmative, please provide copies of all relevant policies or procedures issued by headquarters.

- c. If your answer to preceding part b is anything other than an unqualified affirmative, what is the likelihood that the carrier would take letter-shaped Standard ECR mailing presorted to LOT directly to the carrier's vehicle and would treat the letters as a "third" bundle?

**VP/USPS-T39-45.**

As a hypothetical, assume that a city carrier on a mounted route had so many separate bundles and trays of saturation mailings that at each stop the carrier had to get up from the seat, go back into the vehicle to pick up items (for that stop) from those bundles and trays that are out of arm's reach, then return to the seat and load the mail into the recipient's mailbox. Assume further that the carrier's activities that day were being recorded in the city carrier costing system. How would the time required to go back into the vehicle to pick up those items that are out of arm's reach be recorded? As access time? Load time? Street support time?

**VP/USPS-T39-46.**

- a. Please refer to the response to VP/USPS-T39-15 and provide a responsive answer to part a, which asks whether the AFSM 100 or the FSM 1000 could process untabbed "wraps" **assuming that those pieces were to have an address printed on them.** That is, are such pieces within the current handling capabilities of the AFSM 100 or the FSM 1000?

- b. When the Postal Service develops the ability to DPS flats, what will be benefit of having carrier-route presorted flats?

**VP/USPS-T39-47.**

Please refer to your response to VP/USPS-T39-22.

- a. During the summer months, does the Postal Service eliminate casual and Part Time Flexible (“PTF”) employees? If not, to what extent are their schedules (and costs) reduced?
- b. During the summer months, can the Postal Service reduce the hours of full-time employees who have not been employed by the Postal Service for six years, and who do not have job security guaranteed?
- c. During the summer months, can the Postal Service temporarily lay off full-time employees who have not been employed by the Postal Service for six years, and who do not have job security guaranteed?
- d. How much flexibility does the Postal Service have to adjust its work force to the “average week” operating plan for summer months, which usually exhibit a decline in mail volume?
- e. If a postal facility has more employees than its needs for, say two or three months, to what kinds of activities are those extra employees assigned?

**VP/USPS-T39-48.**

Regarding flats which are identified as accompanying detached address labels:

- a. What is the average weight?
- b. What percentage of such flats weighs more than 3.5 ounces?
- c. What percentage of such flats weighs more than 3.0 ounces?

**VP/USPS-T39-49.**

Regarding parcels which are identified as accompanying detached address labels:

- a. What is the average weight?
- b. What percentage of such parcels weighs more than 3.5 ounces?
- c. What percentage of such parcels weighs more than 3.0 ounces?

**VP/USPS-T39-50.**

According to Handbook F-45, at page 12-10, the IOCS sampler is to identify the shape of a single piece of mail handled by the postal employee as "Detached Address Card--Parent Piece Unidentifiable" if "the employee is handling a detached address card (see description below) **without** an accompanying parent piece, and it is not possible to identify the parent piece." Emphasis in original. What are the activities a postal employee would be engaged in where that employee is handling a detached address card without the accompanying parent piece available for identification?