

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2001

Docket No. R2001-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO VAL-PAK INTERROGATORIES
REDIRECTED FROM WITNESS HARAHUSH
(VP/USPS-T5-4-6)

The United States Postal Service hereby provides responses to the following interrogatories of Val-Pak Direct Marketing Systems, Inc. and Val-Pak Dealers' Association: VP/USPS-T5-4-6, filed on October 12, 2001. Interrogatories 4-6 were redirected to the Postal Service from witness Harahush.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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October 26, 2001

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS,
(REDIRECTED FROM WITNESS HARAHUSH)

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?

RESPONSE

- a. See response to VP/USPS-T39-36 part a, redirected to the Postal Service.
- b. The City Carrier Route Test counts volume of mail by subclass and does not measure time spent by the carrier. In the established Postal Rate Commission methodology, the Street Time Sampling system (STS) captures the time spent by the carrier in the following activities: load, running time (access and route), driving time, street support, and collection (See USPS-T-11, workpaper B, worksheet 7.0.4.1). USPS-LR-J-1 defines street support as
For letter routes, street support costs include the costs for such activities as traveling to and from the route and carrier station, loading and unloading the vehicle at the office and on the street, on-route mail preparation, waiting for relay mail, unloading mail from relay boxes, training, and clocking in and out.
Therefore, time spent reloading the satchel would be categorized as street support under the established methodology. The driving time associated with the additional park point necessitated by the need to reload a satchel, is included in the driving time analysis of routine loops/dismounts. (See USPS-T-11, workpaper B, worksheet 7.0.4.4).

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS,
(REDIRECTED FROM WITNESS HARAHUSH)**

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?**

RESPONSE

- a. See response to VP/USPS-T39-37, part a, redirected to the Postal Service.**
- b. The City Carrier Route Test counts volume of mail by subclass, and does not measure time spent by the carrier. In the established Postal Rate Commission methodology, the Street Time Sampling system (STS) captures the time spent by the carrier in the following activities: load, running time (access and route), driving time, street support, and collection (See USPS-T-11, workpaper B, worksheet 7.0.4.1). USPS-LR-J-1 defines street support as**

For letter routes, street support costs include the costs for such activities as traveling to and from the route and carrier station, loading and unloading the vehicle at the office and on the street, on-route mail preparation, waiting for relay mail, unloading mail from relay boxes, training, and clocking in and out.

Therefore, any time spent rearranging mail in the vehicle while on a curb route is included in the street support activity in the established methodology.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS,
(REDIRECTED FROM WITNESS HARAHUSH)**

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?**

RESPONSE

- a. Yes.**
- b. The Rural Carrier Route Test counts volume of mail by compensation category and subclass, and does not record the time spent by the rural carrier. Rural carrier compensation is not directly based on time but is based on workload as measured in the National Rural Mail Count (see USPS-LR-J-71). The actual time spent by a rural carrier in handling this workload does not serve as the basis for rural carrier compensation or the delivery cost. Both compensation and cost are based upon the route specifications determined in the National Rural Mail Count.**

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.


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