

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 KINGSLEY TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING
SYSTEMS, INC. AND VAL-PAK DEALERS' ASSOCIATION, INC.
(VP/USPS-T39-25, 31, and 38)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of VAL-PAK Direct Marketing System, Inc. and VAL-PAK Dealers' Association, Inc.: VP/USPS-T39-25, 31, and 38, filed on October 12, 2001. VP/USPS-T39-24, 26-30, and 32-37 were redirected to the Postal Service and will be provided separately.

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 UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS, INC.

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?

RESPONSE:

- (a) See DMM A060.1.3.
- (b) See DMM A060.1.0.

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VP/USPS-T-39-31

- 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?

Response:

- (a) The intent of the rules is to exclude the use of DALs for letters. It would not be efficient to allow the option of using DALs, which need to be distributed at each carrier's case, with letter mail when the host letters would be sorted and delivered in a similar fashion as the DALs, if they contained the address. DALs with letters would result in additional costs while providing little or no benefit. On the other hand, saturation mailings of addressed flat mail can result in cumbersome bundles and more casing time for the carrier, so DALs can be beneficial.
- (b) Yes, but only with saturation mailings of Standard Mail and Periodicals Mail and with Bound Printed Matter mailings that meet the additional requirements listed in DMM A060.1.4.
- (c) Yes, but only with saturation mailings of Standard Mail and with Bound Printed Matter mailings that meet the additional requirements listed in DMM A060.1.4.

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VP/USPS-T-39-38

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?

Response:

As mentioned in page 20 of my testimony, the Postal Service is in the evaluation stage for DPSing flats beyond the Test Year of FY 2003. What portion of flats will be in DPS is still unknown. Many outstanding items related to DPSing flats are still yet to be determined, which would impact the estimated number of delivery points the average city carrier could serve.

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.

Joseph K. Moore

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