

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

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OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSES OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS, INC. AND
VAL-PAK DEALERS' ASSOCIATION, INC.
(VP/USPS-T39-39-45)

The United States Postal Service hereby provides the responses to the following interrogatories of VAL-PAK Direct Marketing System, Inc. and VAL-PAK Dealers' Association, Inc.: VP/USPS-T39-39-45, filed on October 24, 2001.

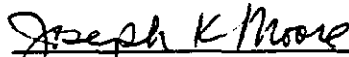
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 7, 2001

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

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.).

Response:

a) 168,119 City Routes

b) Foot	13,513
Park & Loop	89,781
Curb	39,237
Dismount	24,939
Other	649

c) Routes have not been forecasted.

d) Routes are not forecasted by type.

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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))?

Response:

- a. Letter carriers on foot/park and loop routes would simply place an appropriate number of unaddressed flats from both mailings on the case ledge in front of them after casing all letters and flats for that days delivery. During the pull down process, the letter carrier would place one unaddressed flat piece from a set that was placed on the ledge behind one unaddressed flat piece from the other set until the appropriate number of stops from that particular relay was completed. This process would continue until the entire route was pulled down.
- b. There is no collation rate.

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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))?

Response:

There are no formal or informal measurements on this activity. Any response given would be totally anecdotal and based on the personal observation of a single observer.

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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.

Response:

a. and b. The Postal Service considers the casing of unaddressed flats as wasteful and unnecessary. As far as priority of processing goes, the fact that the flats are unaddressed does not change their class of mail or order in the processing categories. The reasons the Postal Service does not promote casing unaddressed flats is because we have developed methods whereby any carrier, whether mounted, park and loop, or walking can take the unaddressed flats out on the street and only case the DALs. That being the case, there would be no justification to spend time on the casing of mail that will not aid in its ultimate delivery.

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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?

Response:

- a. The current Carrier Route Vehicles used on curblin routes in city delivery have a holding tray that can accommodate three letter trays. A tray may hold bundles of more than one sequenced mailing.
- b. For rural carriers using a private vehicle, this is unknown. It depends upon the type and size of the vehicle.

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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?

Response:

- a. No.
- b. Not Applicable
- c. Handling of this mail is locally determined based upon individual circumstances.

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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?

Response:

First of all, a situation that would require the carrier to get up and retrieve mail pieces from saturation mailings at each delivery does not occur. If it did occur, the city carrier costing procedures would pick it up as "street support."

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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