

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 UNITED STATES POSTAL SERVICE
WITNESS SCHENK TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING
SYSTEMS, INC. AND VAL-PAK DEALERS' ASSOCIATION, INC., REDIRECTED
FROM WITNESS KINGSLEY
(VP/USPS-T39-48-49)

The United States Postal Service hereby provides the responses of witness Schenk to the following interrogatories of Val-Pak Direct Marketing Systems, Inc. and Val-Pak Dealers' Association, Inc.: VP/USPS-T39-48-49, filed on October 24, 2001. Interrogatory VP/USPS-T39-48-49 was redirected from witness Kingsley.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Nan K. McKenzie

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November 7, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SCHENK
TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS, INC. AND
VAL-PAK DEALERS' ASSOCIATION, INC. REDIRECTED FROM WITNESS KINSLEY

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?

RESPONSE:

a. – c. To my knowledge there are no data available that provide the weight of all flats identified as accompanying detached address labels (DALs). In USPS-LR-J-58, volume and weight data are provided for all flats. These data are from the PERMIT system, which does not identify flats with DALs separately from flats without DALs.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SCHENK
TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS, INC. AND
VAL-PAK DEALERS' ASSOCIATION, INC. REDIRECTED FROM WITNESS KINSLEY**

VP/USPS-T39-49

Regarding parcels which are identifies 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?

RESPONSE:

a. – c. To my knowledge there are no data available that provide the weight of all parcels identified as accompanying detached address labels. In USPS-LR-J-58, Spreadsheet ECR Parcels (detailed) in Workbook LR58AECR, I provide the volume and weight data for Standard ECR parcels, all of which must be accompanied by DALs (see witness Hope's response to VP/USPS-T31-12b). These data show that the average weight of all Standard ECR parcels is 0.22 pounds, 31.9 percent of all ECR parcels weigh more than 3.5 ounces, and 34.2 percent of all ECR parcels weigh more than 3.0 ounces. Volume and weight data for other parcels do not distinguish between those with and without DALs. The PERMIT system, which is the source of the volume and weight data in USPS-LR-J-58, does not distinguish parcels with or without DALs.

DECLARATION

I, Leslie M. Schenk, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.



Leslie M. Schenk

Dated: 11/7/21

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.



Nan K. McKenzie

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