

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

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POSTAL RATE AND FEE CHANGES, 1997)

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R97-1

VAL-PAK DIRECT MARKETING SYSTEMS, INC.,
VAL-PAK DEALERS' ASSOCIATION, INC., AND
CAROL WRIGHT PROMOTIONS, INC
FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO POSTAL SERVICE WITNESS DONALD O'HARA (VP-CW/USPS-T30-1-5)
(August 21, 1997)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Val-Pak Direct Marketing Systems, Inc., Val-Pak Dealers' Association, Inc., and Carol Wright Promotions, Inc., d/b/a "Cox Direct," 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,



William J. Olson

John S. Miles

Alan Woll

William J. Olson, P.C.

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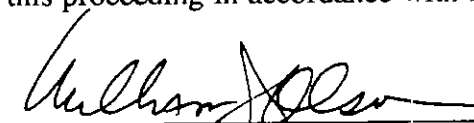
McLean, Virginia 22102-3823

(703) 356-5070

Counsel for Val-Pak Direct Marketing Systems, Inc.,
Val-Pak Dealers' Association, Inc., and
Carol Wright Promotions, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served by hand delivery or mail the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.


William J. Olson

August 21, 1997

VP-CW/USPS-T30-1.

Your testimony at page 35 states that delivery of ECR mail may be deferred.

- a. Under Postal Service standards, regulations or other guidelines what is the maximum length of time that ECR mail can be deferred (i) at a DDU, (ii) at a DSCF, (iii) at a DBMC, (iv) at a OBMC, and (v) at a OSCF?
- b. Does the Postal Service keep any kind of records on either (i) the number of occasions that ECR mail is actually deferred, or (ii) the length of deferral when ECR mail is deferred? Please explain any answer that is not an unqualified negative, and identify the type of records kept.

VP-CW/USPS-T30-2.

- a. Please identify all applicable service and/or delivery standards, regulations or other guidelines for Standard A ECR and/or Regular Mail.
- b. Please identify whether there are different service and/or delivery standards for Standard A ECR and/or Regular mail entered at (i) DSCFs and (ii) DDUs.

VP-CW/USPS-T30-3.

At page 35 of your testimony you refer to the Postal Service accommodating mailer requests for delivery within a specific time frame.

- a. With respect to the Postal Service's efforts to accommodate such requests, can ECR mailers request day-certain delivery? If so, under what conditions?
- b. If a request for day-certain delivery is not an option, what is the minimum time frame that ECR mailers can request? (E.g., two days? three days?)

- c. With respect to ECR mail for which delivery has been requested within a specific time frame, does the Postal Service keep any kind of records, or have any data that would show the percentage of ECR mail that is in fact delivered within the time frame requested by mailers? If so, please provide such data for Base Year 1996.

VP-CW/USPS-T30-4.

- a. Your testimony at pp. 2-3 lists the nine criteria of 39 U.S.C. §3622(b). In your opinion, under which of the nine criteria should the actual performance in delivery be reflected? If you do not consider actual service performance to be relevant to the establishment of pricing levels, please explain why.
- b. (i) Please indicate those subclasses for which have you endeavored to take account of actual performance in delivery provided by the Postal Service, and (ii) please indicate how such performance in delivery affected your recommendation to increase or reduce the cost coverage.

VP-CW/USPS-T30-5.

At p. 36 of your testimony you state that:

a lower coverage for ECR would have made it more difficult to design rates so that the Automation 5-digit rate in Standard Regular was below the ECR basic rate, encouraging the movement of ECR basic letters into the automation mailstream. As has been the case since at least Docket No. MC95-1, this is an important operational goal of Postal Service management.

- a. Is the goal of the Postal Service to achieve lowest combined cost, or to encourage movement of ECR basic letters into the automation mailstream regardless of cost?

- b. Wouldn't mailers' interests be better served by adhering to the principle of lowest combined cost?
- c. Why do ECR basic presort letters continue to have a lower unit cost than automation letters?