

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

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POSTAL RATE COMMISSION
OFFICE OF THE CLERK
Docket No. R2001-41

POSTAL RATE AND FEE CHANGES, 2001)

VAL-PAK DIRECT MARKETING SYSTEMS, INC.
AND VAL-PAK DEALERS' ASSOCIATION, INC.
FOURTH INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS LINDA A. KINGSLEY (VP/USPS-T39-51-52)
(November 8, 2001)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Val-Pak Direct Marketing Systems, Inc. and Val-Pak Dealers' Association, Inc. 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

WILLIAM J. OLSON, P.C.

8180 Greensboro Drive, Suite 1070

McLean, Virginia 22102-3860

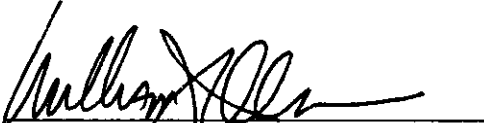
(703) 356-5070

Counsel for:

Val-Pak Direct Marketing Systems, Inc. and
Val-Pak Dealers' Association, Inc.

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.



William J. Olson

November 8, 2001

VP/USPS-T39-51.

In order for an ECR mailing of flat-shaped pieces with Detached Address Labels (“DALs”) specifically addressed to an individual customer or residence to qualify for the Saturation rate, what is the minimum percentage of addresses on the route that must receive mail?

VP/USPS-T39-52.

Please see the exhibit attached to this interrogatory, which is a copy of a First-Class hand-written envelope posted in the borough of Manhattan in New York City to ZIP code 11374, which is in the borough of Queens (the name and street address of the sender and recipient have been redacted). The barcode, however, is for an entirely different ZIP code, 10022-1185, which caused the envelope to be mis-delivered. Inasmuch as the address on the envelope is hand written, the envelope presumably was barcoded by the Postal Service.

- a. In your opinion, was the barcode applied by equipment designed to read hand-written addresses, or was it likely applied by a remote barcoding operation?
- b. Does the Postal Service have any data on the percentage of envelopes to which it applies barcodes that do not correspond to the address? If so, please provide.

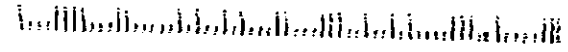


NEW YORK NY 10021



Woodhaven Blvd
Rego PK NY 11374 apt 5-15

10022/1185



VP/USPS-T39-52
Exhibit