

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Docket No. R2001-1

POSTAL RATE AND FEE CHANGES, 2001)

VAL-PAK DIRECT MARKETING SYSTEMS, INC.
AND VAL-PAK DEALERS' ASSOCIATION, INC.
THIRD INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS JOSEPH D. MOELLER (VP/USPS-T32-6-9)
(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

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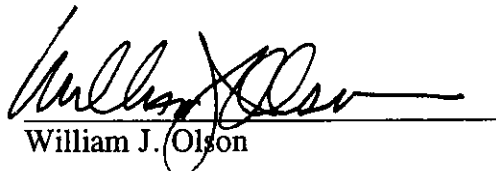
Counsel for:

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-T32-6.

Please refer to your response to VP/USPS-T32-5, and describe all efforts, including unsuccessful efforts, by the Postal Service over the years to develop a performance measurement system for Standard Mail (formerly Standard A and third-class mail) that is nationally representative and statistically valid, regardless of whether such system was planned to rely on internal data or externally validated data. In your response, please cite all instances of which you or others in the Postal Service are aware where the Postal Service has publicly indicated plans to have some such performance measurement system in place.

VP/USPS-T32-7.

- a. Please refer to your response to VP/USPS-T32-5, and indicate whether the Postal Service aggregates performance data — over those Standard Mail mailings that participate — in either the Advance or the CONFIRM internal systems mentioned in your response. Unless your answer is an unqualified negative, please indicate whether such aggregated data are developed on a quarterly basis.
- b. For Base Year 2000, please provide such quarterly (or annual) aggregate performance data as are available for Standard Mail. If you have such data broken down as between Standard Regular and Standard ECR, please do so. If the data show the actual time to deliver versus the standard set forth in the Postal Service's response to Rule 54(n) in its Request in this case — which, incidentally, still refers to "Standard A" — please provide the breakdown.

VP/USPS-T32-8.

Please refer to the chart in the Postal Service's response to Rule 54(n) in its Request in this case that shows the service standards for all major classes of mail.

- a. Please confirm that in the above-referenced chart "Standard A" (now Standard Mail) has the lowest performance standard for all the classes shown, lower even than "Standard B" (now Package Services). If you do not confirm, please explain.
- c. Would you agree that the volume of Standard Mail is sufficient to warrant development of a nationally-representative, statistically-valid performance measurement system? If not, please explain.
- b. Please explain why the Postal Service appears to put such a low priority on developing a nationally-representative, statistically-sound system for measuring actual performance that is provided to Standard Mail.
 - (i) In your response, please indicate whether the reason in part is that the Postal Service does not want to know and/or publicize the actual service given to and received by Standard Mail (formerly Standard A and third-class).
 - (ii) In your response, please state whether the reason in part is that Standard Mail has such a low service standard, as evidenced by the above-referenced chart in the response to Rule 54(n), that the Postal Service deems such effort not worthwhile.

VP/USPS-T32-9.

- a. Please confirm that H.R. 22, a bill proposed in the last Congress, would have required the Postal Service to develop a performance measurement system for Standard Mail. If you do not confirm, please explain.
- b. With respect the above referenced performance measurement provision in H.R.22, did the Postal Service at any time take any public position, whether endorsing it, opposing it, or just explaining the perceived difficulty that it might cause the Postal Service? If so, please explain fully.
- c. Has the Postal Service at any time formulated any plans, however tentative, with respect to how it would develop and implement a performance measurement system in response to the provision for same in H.R. 22? If so, please describe.