

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

VP/USPS-T4-4.

Please assume that the Postal Service receives a Standard ECR mailing consisting of detached address labels ("DALs") and unaddressed flat-shaped "wraps."

- a. For any portion of the mailing, does the Postal Service count the number of DALs to verify that they are equal to the number of pieces shown on Form 3602?
- b. For any portion of the mailing, does the Postal Service count the number of wraps to verify that they are equal to the number of pieces shown on Form 3602?
- c. Please assume that the number of DALs should happen to exceed the number of wraps.
 - (i) Would the basis for computing the postage be the number of DALs or the number of wraps?
 - (ii) Under the circumstances envisioned here, would the volume recorded by the RPW system be the number of DALs or the number of wraps?
 - (iii) What would the Postal Service do with the DALs for which there were insufficient wraps?
- d. Please assume that the number of wraps should happen to exceed the number of DALs.
 - (i) Would the basis for computing the postage be the number of DALs or the number of wraps?
 - (ii) Under the circumstances envisioned here, would the volume recorded by the RPW system be the number of DALs or the number of wraps?
 - (iii) What would the Postal Service do with the extra unaddressed wraps?

RESPONSE. My response to this question is based on discussions with other postal officials.

- a-b. At the point of mail verification and acceptance, the Postal Service does not count all mailpieces and DALs; instead, the Postal Service utilizes sample-based weight verification for identical-weight piece mailings, or other verification methods outlined in a specific postage payment system

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agreement for nonidentical-weight piece mailings. See DMM A060.5.2,
P910, P920, and P930.

- c-d. (i) If the mailpiece and DAL totals differ, the postage is based on the greater of the two counts. See DMM A060.5.2.
- (ii) The RPW System captures the number of pieces reported on the postage statement. See also my response to USPS-T4-6.
- (iii) The mailer is required to specify how the Postal Service handles the disposition of excess or undeliverable mailpieces and accompanying DALs, including the holding of mailpieces or DALs pending the supply of additional materials. See DMM A060.4.1.

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VP/USPS-T4-5.

Please confirm that, when the Postal Service receives a Standard ECR mailing consisting of DALs and unaddressed flat-shaped "wraps," the RPW System attributes all revenues from that mailing to flats. If you do not confirm, please explain how the revenues are recorded.

RESPONSE. Confirmed.

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VP/USPS-T4-6.

Please assume that the Postal Service receives a Standard ECR mailing consisting of, say, 1 million DALs and 1 million unaddressed flat-shaped "wraps."

- a. Does the RPW System record the DALs as 1 million letter-shaped pieces? If not, what record, if any, is made of the volume of DALs?
- b. Does the RPW System record the wraps as 1 million flat-shaped pieces?
- c. Does the RPW System record the weight of the DALs and wraps combined, or does the RPW system record only the weight of the wraps? Please explain.

RESPONSE.

- a-b. The RPW System records DAL mailings as flats. A mailpiece and its accompanying DAL are considered a single mailpiece. The RPW System records a Standard Mail ECR mailing of 1 million mailpieces and accompanying DALs as 1 million flats.
- c. The RPW System records the combined weight of the mailpiece and its accompanying DAL, as required for postage computation. See also DMM A060.5.2.