

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

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 HARAUSH
(VP/USPS-T5-13(d) & (e))

The United States Postal Service hereby provides the responses of witness Schenk to the following interrogatory of Val-Pak Direct Marketing Systems, Inc. and Val-Pak Dealers' Association, Inc.: VP/USPS-T5-13 (d) & (e), filed on October 30, 2001. Interrogatory VP/USPS-T5-13 (d) & (e) were redirected from witness Harahush.

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 14, 2001

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

VP/USPS-T5-13.

Please refer to LR-J-131, WP1, Page H, tab COST, column 2, which shows unit delivery costs for ECR letters and flats in various presort conditions.

- d. Do the delivery costs for Standard ECR Mail shown in the above-referenced spreadsheet include all volume variable city carrier costs included in Cost Segment 6 and 7, or are some (or all) of the costs in Cost Segment 6 included under Mail Processing?
- e. Do the delivery costs for Standard ECR Mail shown in the above-referenced spreadsheet include all volume variable rural carrier costs included in Cost Segment 10? If not, please explain how those costs are apportioned between (i) Mail Processing and (ii) Delivery?

RESPONSE:

- d. Yes, the costs for Standard ECR Mail shown in the above-referenced spreadsheet include all volume variable city carrier costs included in Cost Segments 6 and 7.

The "delivery cost" nomenclature used in USPS-LR-J-117 is a carry-over from USPS-LR-I-95/R2000-1; these costs are more correctly described as "carrier costs."
- e. Yes, the costs for Standard ECR Mail shown in the above-referenced spreadsheet include all volume variable city carrier costs included in Cost Segment 10. The "delivery cost" nomenclature used in USPS-LR-J-117 is a carry-over from USPS-LR-I-95/R2000-1; these costs are more correctly described as "carrier costs."

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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