

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

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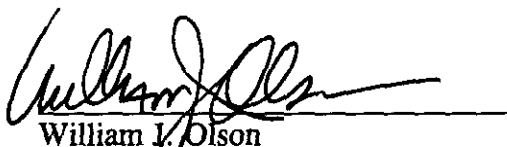
POSTAL RATE AND FEE CHANGES, 2001)

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R2001-1

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 (VP/USPS-9-11)
(November 16, 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.

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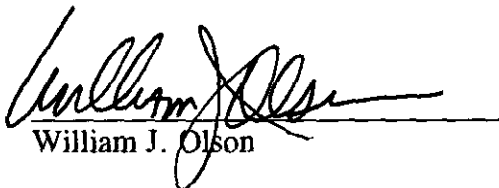
(703) 356-5070

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 16, 2001

VP/USPS-9.

Please refer to the Postal Service's responses to VP/USPS-T39-35 and 36 (redirected from witness Kingsley). Assume that a carrier on a park and loop route has a number of planned loops from each vehicle parking point, as indicated in the response to VP/USPS-T39-36.

- a. When a carrier uses a shoulder satchel to walk a loop, is the carrier limited to taking a maximum of 35 pounds of mail at any one time from the vehicle, the same as a carrier on a walk route? If not, what is the limit?
- b. What is the average weight (or range of weight) that a carrier would carry in the satchel on each loop on a "typical," or average, day?
- c. Could an increase in the weight of mail for a loop, whether caused by more-than-usual volume, heavier-than-usual pieces, or some combination of the two, necessitate the carrier's return to the vehicle to re-load the satchel before completing the usual loop?
- d. Could an increase in the weight of mail for a route, whether caused by more-than-usual volume, heavier-than-usual pieces, or some combination of the two, necessitate (i) more loops from one vehicle parking point, (ii) more parking points, (iii) more parking points and more loops on the entire route, or (iv) a realignment and shortening of the route? Please explain.

VP/USPS-10.

- a. In Base Year 2000, for city carrier routes what was the average number of addresses or delivery points served?
- b. In Base Year 2000, for city carrier routes what was the average number of pieces of mail received by each address or delivery point?

VP/USPS-11.

Please refer to the Postal Service's response to VP/USPS-T5-8e (redirected from witness Harahush), which states:

For those city carrier street time costs that are distributed on the basis of the relative proportions of volumes recorded in the city version of the Carrier Cost System, the relative proportions or "distribution keys" are by subclass of mail not by shape.

- a. Once those volume variable city carrier street time costs that are distributed to the subclasses of mail on the basis of the relative proportions of volumes recorded in the city version of the carrier cost system, within a subclass such as Standard ECR, what procedure or basis is used when these particular costs are subsequently distributed by shape; *e.g.*, to derive unit costs by shape and presort category, as shown in USPS-LR-J-131, WP1, page H, COST, column 2?
- b. Once those volume variable city carrier street time costs that are distributed to the subclasses of mail on the basis of the relative proportions of volumes recorded in the city version of the carrier cost system, within a subclass such as Standard ECR, what procedure or basis is used when these particular costs are

subsequently distributed by weight increment; *e.g.*, to derive unit costs by weight increment, as shown in USPS-LR-J-59?

- c. Please identify the Postal Service model, procedure, or system that is used to develop the unit cost for delivery, as discussed in preceding part a? Is it a subset of the Carrier Cost System, or something else?
- d. How does the Postal Service refer to the model, procedure, or system that is used to develop costs by weight increment, as discussed in the preceding part b? Is it a subset of the Carrier Cost System, or something else?