

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 THOMAS W. HARAHUSH (VP/USPS-T5-17)  
(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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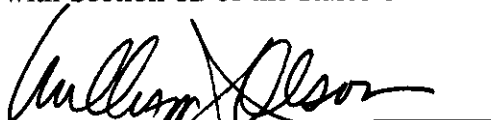
Counsel for:

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-T5-17.**

Please refer to your response to VP/USPS-T5-2, part a, where you state:

Confirmed, with the exception when a carrier uses a mail case that is not divided for letters and flats separately. In that case, measurements are used for determining shape.

- a. Is the casing configuration to which you refer commonly known as the “vertical flats case”? If not, please provide the nomenclature used by the Postal Service to describe such cases.
- b. Does the Postal Service have statistics regarding the number of city carriers that use such cases? If so, please provide data indicating:
  - (i) How many city carrier routes use such cases;
  - (ii) How many do not; and
  - (iii) The type of case or cases used by city carriers that do not have the casing configuration described in your response.
- c. Do in-office costs associated with casing letters and flats into such cases differ from the costs associated with the use of “regular” or “other” city carrier cases? If your answer is anything other than an unqualified negative, please provide all supporting data for your response, including costs and cost differences for all classes/subclasses of mail.