

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSES OF UNITED STATES POSTAL SERVICE  
WITNESS KINGSLEY INTERROGATORIES OF VAL-PAK DIRECT MARKETING  
SYSTEMS, INC. AND VAL-PAK DEALERS' ASSOCIATION, INC.  
(VP/USPS-T39-51-52)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of Val-Pak Direct Marketing Systems, Inc. and Val-Pak Dealers' Association, Inc.: VP/USPS-T39-51-52, filed on November 7, 2001.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Joseph K. Moore

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November 20, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS, INC.

**VP/USPS-T39-51** In order for an ECR mailing of flat-shaped pieces with Detached Address Labels (“DALs”) specifically addressed to an individual customer or residence to qualify for the Saturation rate, what is the minimum percentage of addresses on the route that must receive mail?

**Response:**

See DMM A060.1.2 for the percentage of total addresses and residential addresses. If simplified addressing is used when eligible, every family on a rural route or every box holder must receive mail (see DMM A040.1.1).

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**VP/USPS-T39-52**

Please see the exhibit attached to this interrogatory, which is a copy of a First-Class hand-written envelope posted in the borough of Manhattan in New York City to ZIP code 11374, which is in the borough of Queens (the name and street address of the sender and recipient have been redacted). The barcode, however, is for an entirely different ZIP code, 10022-1185, which caused the envelope to be mis-delivered. Inasmuch as the address on the envelope is hand written, the envelope presumably was barcoded by the Postal Service.

- a. In your opinion, was the barcode applied by equipment designed to read hand-written addresses, or was it likely applied by a remote barcoding operation?
- b. Does the Postal Service have any data on the percentage of envelopes to which it applies barcodes that do not correspond to the address? If so, please provide.

**Response:**

- (a) The piece was barcoded by the Postal Service through RBCS by a keyer. One likely possibility for this piece was that it was "double-fed" when the image was lifted and the ID Tag was sprayed. So, when the two pieces were fed together, the image from the top piece was lifted, however, the bottom piece received the ID Tag on the back and consequently, the incorrect barcode when it was separated from the top piece on the BCS/OSS.
- (b) I am unaware of data indicating the percentage of incorrect barcodes that are applied.

## 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.

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Joseph K. Moore

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November 7, 2001