

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

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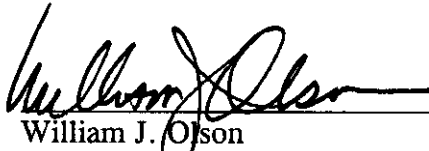
POSTAL RATE AND FEE CHANGES, 2001 )

POSTAL RATE COMMISSION  
OFFICE OF THE CLERK  
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  
WITNESS LESLIE M. SCHENK (VP/USPS-T43-18-19)  
(November 21, 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.

8180 Greensboro Drive, Suite 1070

McLean, Virginia 22102-3860

(703) 356-5070

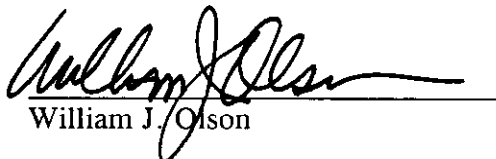
Counsel for:

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 21, 2001

**VP/USPS-T43-18.**

- a. Please provide as library references (i) summary results of the latest national rural mail count, and (ii) instructions for conducting the national rural mail count, including the evaluated time credits for mail handled in the office and on the route.
- b. Please specify the evaluated time in the office and on the route for handling (i) letters, (ii) ordinary Standard ECR flats, (iii) Detached Address Labels (“DALs”), (iv) flat-shaped covers that accompany DALs, and (v) small parcels that can fit easily into a mailbox and that do not require dismount.

**VP/USPS-T43-19.**

Please refer to your response to MMA/USPS-T43-6(E). Is your response intended to convey that the contractually-specified route evaluation factors for rural carriers may have little relationship to the actual time or cost of performing the specified functions? Unless your answer is an unqualified affirmative, please specify contractually-specified route evaluation factors that, in your opinion, do not bear much resemblance to the actual labor required to perform the function.