

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

RECEIVED
Nov 26 4 45 PM '01

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.
SECOND INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS ROBERT L. SHAW, JR. (VP/USPS-T1-7)
(November 26, 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,

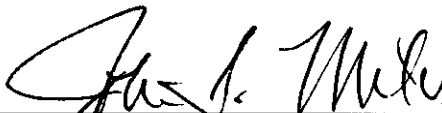


William J. Olson
John S. Miles
WILLIAM J. OLSON, P.C.
8180 Greensboro Drive, Suite 1070
McLean, Virginia 22102-3860
(703) 356-5070

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.


John S. Miles

November 26, 2001

VP/USPS-T1-7.

Assume that a city carrier has finished pulling down and strapping out all mail cased in the office and is in the process of taking mail to the carrier's vehicle when the carrier is tallied by the In-Office Cost System ("IOCS").

- a. In general, when an IOCS tally is taken while the carrier is loading or preparing to load the vehicle, does the tally indicate the class/ subclass or classes/subclasses of mail being handled?
- b. Suppose that at the time of the tally the carrier was taking 500 detached address labels ("DALs") plus Standard ECR flat covers weighing 4 ounces each, which totals to 2000 ounces, or 125 pounds, to the carrier's vehicle. In other words, although carriers normally might be expected to be handling mixed classes when taking mail to their vehicle, on this particular occasion the carrier loading the vehicle happens to be handling only one class of mail — Standard ECR — at the time of the tally.
 - (i) Would this particular tally indicate the class of mail being handled?
 - (ii) Would this particular tally indicate the shape of the mail being handled? If so, what shape would be recorded: letter-shape for the DALs, or flat-shape for the covers?
 - (iii) Assume that the carrier has a mounted route, and can take the DALs directly to the route unsorted. If the carrier were tallied when taking 500 DALs to the vehicle, would this particular tally indicate that it was a DAL mailing being handled?