

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

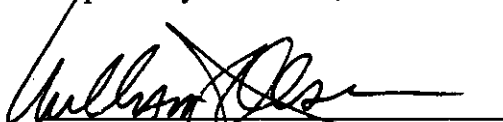
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POSTAL RATE COMMISSION
OFFICE OF THE CLERK
Docket No. R2001-41

POSTAL RATE AND FEE CHANGES, 2001)

VAL-PAK DIRECT MARKETING SYSTEMS, INC. AND
VAL-PAK DEALERS' ASSOCIATION, INC.
SIXTH INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS LINDA A. KINGSLEY (VP/USPS-T39-54-60)
(November 30, 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,




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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 30, 2001

VP/USPS-T39-54.

Please assume that, on a particular day, a Destination Delivery Unit (“DDU”) has no Standard ECR Saturation mailings of flats, but it has received one Standard ECR Saturation letter mailing, entered at the DDU, for delivery that day (or the next).

- a. If the DDU is **not** one that receives mail in delivery point sequence (“DPS”) from the processing and distribution center (“P&DC”), and does **not** have a Carrier Sequence Bar Code Sorter (“CSBCS”), what is the likelihood that carriers on **foot routes** or **park and loop routes** will either (i) take the Saturation letter mailing directly to their routes as a “third” bundle, or (ii) sort the Saturation letters manually in the office?
- b. If the DDU is among those that receive DSP’d mail from the P&DC, what is the likelihood that carriers on **foot routes** or **park and loop routes** will either (i) take the Saturation letter mailing directly to their routes as a “third” bundle; (ii) sort the Saturation letters manually in the office; or (iii) send the Saturation letter mailing back to the P&DC to be DPS’d?
- c. In explaining your answers to parts a and b, please state whether the Postal Service has a relevant policy or practice.

VP/USPS-T39-55.

Please assume, on a particular day, a DDU has one Standard ECR Saturation mailing of addressed flats (*e.g.*, catalogs), and it also has received one Standard ECR Saturation letter mailing, entered at the DDU, both for delivery that day. In answering the following questions,

please explain the rationale for how such decisions are made, and state whether the Postal Service has a relevant policy or practice.

- a. If the DDU is **not** one that receives DPS'd mail from the P&DC, what is the likelihood that carriers on **foot routes** or **park and loop routes** will (i) take only the Saturation flat mailing directly to their routes as a "third" bundle, or (ii) take only the Saturation letter mailing directly to their routes as a "third" bundle, or (iii) take both Saturation mailings directly to the route as "extra" bundles?
- b. If the DDU is **not** one that receives DPS'd mail from the P&DC, what is the likelihood that carriers on **mounted** routes will (i) take only the Saturation flat mailing directly to their routes as a "third" bundle, or (ii) take only the Saturation letter mailing directly to their routes as a "third" bundle, or (iii) take both Saturation mailings directly to the route as "extra" bundles?
- c. If the DDU is among those that receive DPS'd mail from the P&DC, what is the likelihood that carriers on **foot routes** or **park and loop routes** will (i) take only the Saturation flat mailing directly to their routes as a "third" bundle, or (ii) take only the Saturation letter mailing directly to their routes as a "third" bundle, or (iii) take both Saturation mailings directly to the route as "extra" bundles, or (iv) defer the Saturation letter mailing until the next day and send it back to the P&DC to be DPS'd, or (v) do something else?
- d. If the DDU is among those that receive DPS'd mail from the P&DC, what is the likelihood that carriers on **mounted** routes will (i) take only the Saturation flat

mailing directly to their routes as a “third” bundle, or (ii) take only the Saturation letter mailing directly to their routes as a “third” bundle, or (iii) take both Saturation mailings directly to the route as “extra” bundles, or (iv) defer the Saturation letter mailing until the next day and send it back to the P&DC to be DPS’d, or (v) do something else?

VP/USPS-T39-56.

- a. For city carriers, in Base Year 2000, what is the average hourly wage, including all benefits, but excluding indirect piggyback costs?
- b. For city carriers, in Test Year 2003, what is the average hourly wage, including all benefits, but excluding indirect piggyback costs?
- c. For city carriers, in Base Year 2000, what is the average hourly wage, including all benefits, and including all indirect piggyback costs?
- d. For city carriers, in Test Year 2003, what is the average hourly wage, including all benefits, and including all indirect piggyback costs?

VP/USPS-T39-57.

Do city carriers sort all or some detached address labels (“DALs”) on all non-curblines delivery portions of their routes under the following facts:

- a. If the portion of a carrier’s route that is curblines is 75 percent, would the carrier not sort the DALs for that portion of the route?

- b. If the portion of a carrier's route that is curblines is 50 percent, would the carrier **not** sort the DALs for that portion of the route?
- c. If the portion of a carrier's route that is curblines is 25 percent, would the carrier **not** sort the DALs for that portion of the route?
- d. Please describe in detail all circumstances when carriers would **not** sort DALs in the office.

VP/USPS-T39-58.

- a. How does the Postal Service describe whatever it is that the current Carrier Route Vehicles use to hold flats? As a "flat tray?" A flat "tub?" A holding tub? Something else?
- b. How many flat trays (or for flats whatever is equivalent to a holding letter tray) do the current Carrier Route Vehicles have?
- c. As a practical matter, what is the largest number of "extra bundles" of Saturation flats that a carrier can take directly to the route without in-office sortation? That is, since carriers do not get up from their seat and retrieve mail pieces from Saturation mailings at each delivery point, is there some point where the carrier at each stop would be extracting mail from so many different bundles that it would make more sense to sort some of the Saturation flats in the office rather than take them directly to the route as "extra bundles"?

VP/USPS-T39-59.

Please describe how Standard ECR Saturation mailings of covers and DALs are handled on dismount routes and compare that with the way they are handled on (i) **foot routes**, (ii) **park and loop routes**, and (iii) **curb routes**.

In responding to each question, please specify: (i) whether the DALs are sorted in the office, or are taken directly to the route unsorted, and (ii) whether there is any limit on the number of extra bundles of Saturation ECR Mail that the carrier can take to the route unsorted.

VP/USPS-T39-60.

Please assume that on some particular day the carriers at a DDU have two Standard ECR Saturation mailings of flats to be delivered that day. Assume further that many of the routes served by the DDU are **foot routes** or **park and loop routes**, and that carriers on those routes will need to case one of the two mailings of Saturation flats prior to leaving the office. Assume further that a typical route for this office has 480 delivery points. Finally, assume that the “first” Saturation mailing is approximately $3/32$ nds of an inch thick and the “second” is $5/32$ nds of an inch thick.

- a. Please confirm that 480 pieces of the first mailing, stacked one on top of another, will measure about 3.75 linear feet. If you do not confirm, please provide the correct amount.
- b. Please confirm that 480 pieces of the second mailing, stacked one on top of another, will measure about 6.25 linear feet. If you do not confirm, please provide the correct amount.

- c. For a standard vertical flat case used by city carriers, what is the interior width that is available for each residential delivery point on the route?
- d. When city carriers are using standard vertical flat cases, would thicker mailpieces tend to fill up the available space more quickly than thinner mailpieces?
- e. Of the two mailings described above, which would city carriers most likely take to their vehicles as a third bundle, and which would they most likely sort while in the office?