

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2001

Docket No. R2001-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS HARAHUSH TO VAL-PAK INTERROGATORIES
REDIRECTED FROM WITNESS SCHENK
(VP/USPS-T43-11abd)

The United States Postal Service hereby provides the responses of witness Harahush to the following interrogatories of Val-Pak Direct Marketing Systems, Inc. and Val-Pak Dealers' Association: VP/USPS-T43-11abd, filed on November 16, 2001.

These subparts were redirected from witness Schenk.

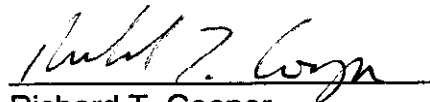
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
(202) 268-2993; Fax: -5402
Washington, D.C. 20260-1137
November 30, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HARAHUSH
TO INTERROGATORY OF VAL-PAK
REDIRECTED FROM WITNESS SCHENK

VP/USPS-T43-11.

- a. Please confirm that in the sample of mail taken for the city carrier cost system, and used as the "volume" basis for distributing costs to mail by class and subclass, as well as by weight, a Standard ECR DAL will be counted as a piece, and the accompanying flat or parcel will also be counted as a piece.
- b. Assuming that Standard ECR DALs are counted when the sample of mail is taken for the city carrier cost system, would they be recorded as letters, or would they be recorded as flats or parcels in accordance with the shape of the accompanying mailpiece?
- d. Do the data that are recorded in the city carrier cost system distinguish between DALs and other similarly-shaped pieces? That is, if DALs are recorded as letters or letter-shaped pieces, can the data base for the city carrier cost system be used to ascertain the number o[r] percentage of "letters" that in fact were DALs? If so, please provide this information for Base Year 2000.

Response:

- a. Please see response to VP/USPS-T5-1a.
- b. Almost invariably, the DAL would be counted as a letter in the city carrier cost system.
- d. The city carrier cost system does not identify a mailpiece as a DAL.

DECLARATION

I, Thomas W. Harahush, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Thomas W. Harahush

Date: 11-30-01

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.


Richard T. Cooper

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