

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 UNITED STATES POSTAL SERVICE
TO VAL-PAK INTERROGATORIES
(VP/USPS-9-11)

The United States Postal Service hereby provides responses to the following interrogatories of Val-Pak Direct Marketing Systems, Inc., and Val-Pak Dealers' Association, Inc.: VP/USPS-911, filed on November 16, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 30, 2001

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

VP/USPS-9 Please refer to the Postal Service's responses to VP/USPS-T39-35 and 36 (redirected from witness Kingsley). Assume that a carrier on a park and loop route has a number of planned loops from each vehicle parking point, as indicated in the response to VP/USPS-T39-36.

- a. When a carrier uses a shoulder satchel to walk a loop, is the carrier limited to taking a maximum of 35 pounds of mail at any one time from the vehicle, the same as a carrier on a walk route? If not, what is the limit?
- b. What is the average weight (or range of weight) that a carrier would carry in the satchel on each loop on a "typical," or average, day?
- c. Could an increase in the weight of mail for a loop, whether caused by more-than-usual volume, heavier-than-usual pieces, or some combination of the two, necessitate the carrier's return to the vehicle to re-load the satchel before completing the usual loop?
- d. Could an increase in the weight of mail for a route, whether caused by more-than-usual volume, heavier-than-usual pieces, or some combination of the two, necessitate (i) more loops from one vehicle parking point, (ii) more parking points, (iii) more parking points and more loops on the entire route, or (iv) a realignment and shortening of the route? Please explain.

RESPONSE:

- a. Yes.
- b. Unknown.
- c. Yes. This may happen on occasion.
- d. (i) Not normally, but on occasion this would require returning to the vehicle as in c. above. (ii) Not normally, but occasionally this may occur. (iii) Not normally, but may possibly occur. (iv) No realignment but assistance may be given to the regular carrier to enable the route to be completed within a certain time frame.

**RESPONSE OF UNITED STATES POSTAL SERVICE
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VP/USPS-10

- a. In Base Year 2000, for city carrier routes what was the average number of addresses or delivery points served?
- b. In Base Year 2000, for city carrier routes what was the average number of pieces of mail received by each address or delivery point?

RESPONSE:

- a. For FY 2000, the average number of addresses or delivery points served for city carrier routes was 496.
- b. For FY 2000, the average number of pieces of mail received by each address or delivery point for city carrier routes was 5.51 pieces per delivery day.

VP/USPS-11.

Please refer to the Postal Service's response to VP/USPS-T5-8e (redirected from witness Harahush), which states:

For those city carrier street time costs that are distributed on the basis of the relative proportions of volumes recorded in the city version of the Carrier Cost System, the relative proportions or "distribution keys" are by subclass of mail not by shape.

- a. Once those volume variable city carrier street time costs that are distributed to the subclass of mail on the basis of the relative proportions of volumes recorded in the city version of the carrier cost system, within a subclass such as Standard ECR, what procedure or basis is used when these particular costs are subsequently distributed by shape; e.g., to derive unit costs by shape and presort category, as shown in USPS-LR-J-131, WP1, page H, COST, column 2?
- b. Once those volume variable city carrier street time costs that are distributed to the subclasses of mail on the basis of the relative proportions of volumes recorded in the city version of the carrier cost system, within a subclass such as Standard ECR, what procedure or basis is used when these particular costs are subsequently distributed by weight increment; e.g., to derive unit costs by weight increment, as shown in USPS-LR-J-59?
- c. Please identify the Postal Service model, procedure, or system that is used to develop the unit cost for delivery, as discussed in preceding part a? Is it a subset of the Carrier Cost System, or something else?
- d. How does the Postal Service refer to the model, procedure, or system that is used to develop costs by weight increment, as discussed in the preceding part b? Is it a subset of the Carrier Cost System, or something else?

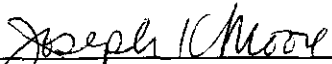
RESPONSE:

- a. Volume variable city carrier street time costs within subclass are distributed to shape in USPS-LR-J-58 and USPS-LR-J-117 by the following methods: delivery route (Cost Segment 7.1) and delivery access (CS 7.2) by volume (RPW number of pieces); elemental load (CS 7.3) by city load distribution key (see City Delivery Carrier workpapers, USPS-LR-J-57, CS06&7.xls); and delivery support (CS 7.4) by total carrier costs.

- b. Volume variable city carrier street time costs are distributed to weight increment within subclass and shape by volumes (RPW pieces) for CS 7.1 and 7.2, by RPW weight for CS 7.3, and by total carrier costs for CS 7.4, as shown in LR58AECR_revised.xls, in USPS-LR-J-58.
- c. See part (a) above.
- d. To my knowledge, there is no specific name used to describe the methodology by which costs are distributed to weight increment, as done in USPS-LR-J-58. This methodology is not a "subset" of the Carrier Cost System.

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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