

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 INTERROGATORY OF VAL-PAK DIRECT MARKETING SYSTEMS, INC. AND
VAL-PAK DEALERS' ASSOCIATION, INC.
(VP/USPS-T43-14a-c)

The United States Postal Service hereby provides the responses of witness Schenk to the following interrogatory of Val-Pak Direct Marketing Systems, Inc. and Val-Pak Dealers' Association, Inc.: VP/USPS-T43-14a-c, filed on November 16, 2001. The interrogatory subparts were redirected from witness Schenk.

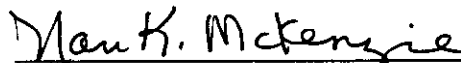
The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Nan K. McKenzie

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December 5, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SCHENK TO INTERROGATORIES
OF VAL-PAK DIRECT MARKETING SYSTEMS, INC.
AND VAL-PAK DEALERS' ASSOCIATION, INC.**

VP/USPS-T43-14.

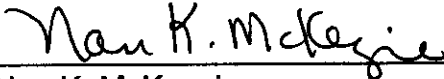
- a. With respect to the National Mail Count for rural carriers, please provide the evaluated time for every class and subclass of items handled, both in the office and while delivering on the route.
- b. In the National Mail Count, would Standard ECR DALs be classified as letters, or would they be classified as flats or parcels in accordance with the shape of the accompanying mailpiece?
- c. If Standard ECR DALs are classified as letters in the National Mail Count for rural carriers, is the level of detail contained in that data base capable of distinguishing between ordinary Standard ECR enveloped letters and DALs? That is, if Standard ECR DALs are recorded as letters, or letter-shaped pieces, can the available data from the city carrier cost system be used to ascertain what percentage of Standard ECR "letters" were in fact DALs? If so, please provide this statistic for Base Year 2000.

RESPONSE

- a. See witness Meehan's workpapers (USPS-T-11, Workpaper B), or the electronic version filed in USPS-LR-J-57, CS10.xls, worksheet 10.1.1, column 2. These are the times allotted to rural carriers to deliver or collect items of the specified evaluation item (letter, flat, parcel, DPS, sector segment, boxholder, collected letter or flat, etc.). The evaluation times for letters, flats, and sector segment include .0166 minutes per piece for strapping out. The evaluation times apply to all pieces of that type, regardless of mail class or subclass.
- b. See the response to VP/USPS-T39-28(b), which describes how DALs are classified during the National Mail Count.
- c. The National Mail Count contains counts of mail by evaluation type, but does not distinguish pieces by mail subclass or standard ECR "letters" from DALs. See the response to VP/USPS-T43-11(d) for the question on the city 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.



Nan K. McKenzie

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