

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
(VP/USPS-T5-17)

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-T5-17, filed on November 16, 2001.

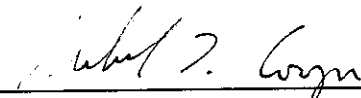
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Richard T. Cooper

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December 7, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HARAHUSH
TO INTERROGATORIES OF VAL-PAK

VP/USPS-17.

Please refer to your response to VP/USPS-T5-2, part a, where you state:

Confirmed, with the exception when a carrier uses a mail case that is not divided for letters and flats separately. In that case, measurements are used for determining shape.

- a. Is the casing configuration to which you refer commonly known as the "vertical flats case?" If not, please provide the nomenclature used by the Postal Service to describe such cases.
- b. Does the Postal Service have statistics regarding the number of city carriers that use such cases? If so, please provide data indicating:
 - (i) How many city carriers use such cases
 - (ii) How many do not;
 - (iii) The type of case or cases used by city carriers that do not have the case configuration in your response.
- c. Do in-office costs associated with casing letters and flats into such cases differ from the costs associated with the use of "regular" or "other" city carrier cases? If your answer is anything other than unqualified negative, please provide all supporting data for your response, including costs and cost differences for all classes/subclasses of mail.

Response:

- a. A DPS vertical flat case work method or a one bundle system work method would utilize a case in which letters and flats were cased together in the same case.
- b. I am informed that the Postal Service does not track the type of case that carriers use.
- c. I am informed that the In Office Cost statistical data system (IOCS) does not collect data by case type. Costs by case type are not produced.

DECLARATION

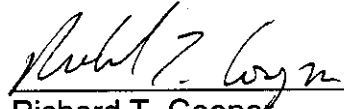
I, Thomas W. Harahush, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Thomas W. Harahush

Date: 12-7-01

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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