

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SHAW
TO INTERROGATORY OF VAL-PAK DIRECT MARKETING SYSTEMS, INC. AND
VAL-PAK DEALERS' ASSOCIATION, INC.
(VP/USPS-T1-7)

The United States Postal Service hereby provides the response of witness Shaw to the following interrogatory of the Val-Pak Direct Marketing Systems, Inc. and Val-Pak Dealers' Association, Inc.: VP/USPS-T1-7, filed on November 26, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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VP/USPS-T1-7: Assume that a city carrier has finished pulling down and strapping out all mail cased in the office and is in the process of taking mail to the carrier's vehicle when the carrier is tallied by the In-Office Cost System ("IOCS").

- a. In general, when an IOCS tally is taken while the carrier is loading or preparing to load the vehicle, does the tally indicate the class/ subclass or classes/subclasses of mail being handled?
- b. Suppose that at the time of the tally the carrier was taking 500 detached address labels ("DALs") plus Standard ECR flat covers weighing 4 ounces each, which totals to 2000 ounces, or 125 pounds, to the carrier's vehicle. In other words, although carriers normally might be expected to be handling mixed classes when taking mail to their vehicle, on this particular occasion the carrier loading the vehicle happens to be handling only one class of mail - Standard ECR - at the time of the tally.
 - i. Would this particular tally indicate the class of mail being handled?
 - ii. Would this particular tally indicate the shape of the mail being handled? If so, what shape would be recorded: letter-shape for the DALs, or flat- shape for the covers?
 - iii. Assume that the carrier has a mounted route, and can take the DALs directly to the route unsorted. If the carrier were tallied when taking 500 DALs to the vehicle, would this particular tally indicate that it was a DAL mailing being handled?

RESPONSE

- a. Not generally. When an IOCS reading is conducted on an employee, who is loading or unloading a vehicle, the employee is usually handling mixed mail all shapes or handling empty equipment.
- b. (i) From your example, my understanding is that the carrier is handling a container composed of only DALs and their associated mailpieces, and it is an identical mailing. In this case, the data collector would indicate in the tally that the container held an identical mailing, and using the combination of a

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DAL and its associated mailpiece indicate the class of mail. Please see library reference USPS-LR-I-14/R2000-1, page 12-11.

(ii) Please see response in part (i). The employee would use the DAL's associated mailpiece to record the shape in the tally. In your example the tally would indicate the shape to be flat.

(iii) Yes, assuming that this is an identical mailing and the only mail being handled by the carrier at the time she is observed.

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.

Kenneth N. Hollies

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