

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

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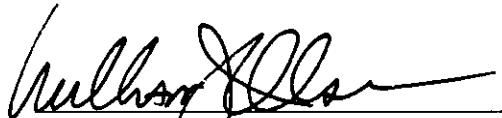
POSTAL RATE AND FEE CHANGES, 2001)

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R2001-1

VAL-PAK DIRECT MARKETING SYSTEMS, INC. AND
VAL-PAK DEALERS' ASSOCIATION, INC.
SEVENTH INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS LINDA A. KINGSLEY (VP/USPS-T39-61-68)
(December 10, 2001)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Val-Pak Direct Marketing Systems, Inc. and Val-Pak Dealers' Association, Inc. hereby submit interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

Respectfully submitted,



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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.



William J. Olson

December 10, 2001

VP/USPS-T39-61.

The established minimum rate for city carriers to case letters is 18 pieces per minute (ppm), and this minimum is applicable to detached address labels (“DALs”). At the same time, witness Shipe in Docket No. R90-1, USPS-T-10, exhibit F, page 1, cites a city carrier casing rate for walk-sequenced letters of 41.2 ppm. As between the established minimum rate of 18 ppm and the 41.2 ppm rate supplied by witness Shipe in Docket No. R90-1, please explain which rate would be most applicable to those DALs that carriers case manually, and explain why.

VP/USPS-T39-62.

The established minimum rate for city carriers to case flats is 8 pieces per minute (ppm), and this minimum would be applicable to “wraps” or “covers” that accompany DALs. At the same time, witness Shipe in Docket No. R90-1, USPS-T-10, exhibit F, page 1, cites a city carrier casing rate for walk-sequenced flats of 27.4 ppm. As between the established minimum rate of 8 ppm and the 27.4 ppm rate supplied by witness Shipe in Docket No. R90-1, please explain which rate would be most applicable to those “wraps” or “covers” that carriers case manually, and explain why.

VP/USPS-T39-63.

In Docket No. R-2000, engineering studies were cited which pertained to city carrier methodologies and costs. Do any of those studies contain data or analyses that would illuminate the handling processes as well as time and cost, both in the office and on the street,

for ECR mail generally, and for DALs and pieces that accompany DALs? If your answer is anything other than an unqualified negative, please provide (i) the applicable engineering studies as a library reference, and (ii) citations to where the pertinent information for ECR mail and DAL mailings can be found in those engineering studies.

VP/USPS-T39-64.

The response to VP/USPS-T39-11 states that “apartment-house type mailboxes are in units of no more than ten boxes and that would make the operation relatively simple and quick.”

- a. Does the Postal Service have a requirement that limits the number of individual boxes within one “unit” of a single apartment-house type mailbox? If so, what is the requirement and where is the requirement stated?
- b. Has that requirement always existed, or do apartment-house type mailboxes exist where one “unit” provides access to more than 10 individual boxes?

VP/USPS-T39-65.

The response to VP/USPS-T39-14 states that “[o]n Curblin city delivery routes, there is **no limitation** on the number of bundles that can be taken on any one day” (emphasis added).

- a. Is the intention of the response to say that only for **Curblin** city delivery routes the Postal Service has no contractual or arbitration limitations for carriers, such as the “third” bundle rule applied to carriers on foot and park and loop routes?

Unless the response is an unqualified affirmative, please explain what the above-quoted statement is intended to convey.

- b. Notwithstanding the response to the preceding part a, what is the “real world” practical limitation as to the number of “extra” bundles of saturation mail that might be taken to a **Curbline city delivery route** on any given day? In other words, in terms of the number of “third” or “extra” bundles, at what point would a city carrier on a Curbline delivery route be forced to (i) perform some level of in-office casing or collation of Saturation ECR mail, or (ii) defer delivery of one or more Saturation ECR mailings within acceptable delivery standards, or (iii) delay one or more Saturation mailings beyond acceptable delivery standards?

VP/USPS-T39-66.

What is the “real world” practical limitation as to the number of “extra” bundles of Saturation mail that might be taken to a **rural delivery route** on any given day? In other words, at what point would a rural carrier be forced to (i) perform some level of in-office casing or collation of saturation ECR mail, or (ii) defer delivery of one or more of the saturation ECR mailings within acceptable delivery standards, or (iii) delay one or more of those saturation mailings beyond acceptable delivery standards? If your answer depends upon the type of vehicle that a rural carrier elects to use on the route, (i) please explain and indicate the difference for the two or three types of postal vehicles most commonly used by rural

carriers, and (ii) please explain and indicate the difference for the two or three types of non-postal private vehicles most commonly used by rural carriers.

VP/USPS-T39-67.

Please provide the following information with respect to the Postal Service's Delivery Point Sequence ("DPS") program. In addition, please provide as a library reference all data sets that show city carrier and rural route level statistics, either at the route level, zone level or in aggregate, and all available correlating data which detail those routes and/or zones that have been converted to a DPS process.

- a. At the start of Base Year 2000, how many routes were supported by DPS capability (*i.e.*, how many routes had already been converted to DPS)?
- b. By the end of Base Year 2000, how many routes were supported by DPS capability (*i.e.*, how many routes had already been converted to DPS)? Of those routes supported by DPS, what percentage used the vertical flats casing method?
- c. At the start of Base Year 2000, how many routes were not supported by DPS capability (*i.e.*, how many routes had not already been converted to DPS)?
- d. By the end of Base Year 2000, how many routes were not supported by DPS capability (*i.e.*, how many routes had not already been converted to DPS)?
- e. Relative to part a above, how many total possible delivery stops were serviced by the routes that were supported by DPS capability?
- f. Relative to part b above, how many total possible delivery stops were serviced by the routes that were supported by DPS capability?

- g. Relative to part c above, how many total possible delivery stops were serviced by the routes that were not supported by DPS capability?
- h. Relative to part d above, how many total possible delivery stops were serviced by the routes that were not supported by DPS capability?

VP/USPS-T39-68.

Please refer to the response to VP/USPS-T39-36(a), which states, *inter alia*, that “[i]n some cases, mail in excess of that which can be loaded into a satchel causes the carrier to make an additional parking stop.” Please clarify by responding to the questions below. Assume that on some day (or days) a carrier has too much mail for a single satchel load to cover an entire “loop,” herein defined as “one of several physical travel patterns that are carried out by a carrier, emanating from and returning to a vehicle or relay device(s).” Assume further that several “loops” would be performed from a single “park point” location.

- a. Do city carriers sometimes have to return to their vehicle to reload their satchels before delivering to all points on one loop?
- b. When such a condition exists, what is a carrier’s process? That is, does the carrier travel the “loop” until running out of mail, then return to the vehicle to replenish the satchel for the remainder of that “loop”? If this is not the process, please describe in detail what the carrier does to service the route under these conditions.