

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 SCHENK TO INTERROGATORY OF VAL-PAK DIRECT MARKETING
SYSTEMS, INC. AND VAL-PAK DEALERS' ASSOCIATION, INC.
(VP/USPS-T43-22)

The United States Postal Service hereby provides the response of witness Schenk to the following interrogatory of Val-Pak Direct Marketing Systems, Inc. and Val-Pak Dealers' Association, Inc.: VP/USPS-T43-22, filed on November 26, 2001. It was inadvertently omitted from a filing yesterday.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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December 13, 2001

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VP/USPS-T43-22. Please refer to USPS-LR-J-117, spreadsheet LR-J-117, tab Rural Crosswalk. Row 70, column C, shows a total of 3,810,544 Standard ECR letters.

- a. Are these data for rural letters derived from the National Rural Mail Count? If not, from what data source are they derived?
- b. Does this total volume of rural letters include DALs? If not, please explain how DALs were excluded from the count. If so, are you able to estimate the number of DALs that are included in the total? If so, please explain how.

RESPONSE:

- a. No, these data for rural letters are derived from the Rural Carrier Costing System (RCCS).
- b. It is my understanding that these rural letter volumes include those DALs that were identified as being letter-shaped (i.e., those with specific addresses), but the information that would identify whether a letter-shaped piece is a DAL or not is not recorded in the RCCS.

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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