

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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Postal Rate and Fee Changes, 2001

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Docket No. R2001-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
WITNESS HARAHUSH TO VAL-PAK INTERROGATORY  
(VP/USPS-T5-8d) - ERRATA

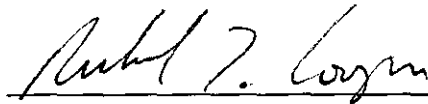
The United States Postal Service hereby provides the revised response of witness Harahush to the following interrogatories of Val-Pak Direct Marketing Systems, Inc. and Val-Pak Dealers' Association: VP/USPS-T5-8abcd, filed on October 30, 2001. Based on newly acquired information, witness Harahush was able to provide a more accurate response to subpart (d) of interrogatory 8. A revised version of the previously-filed response to interrogatory 8abcd is attached.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Richard T. Cooper

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December 13, 2001

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

Revised 12/13/01

**VP/USPS-T5-8.**

Please assume that a carrier has a Standard ECR Saturation mailing consisting of DALs and unaddressed flat-shaped "wraps."

- a. *Would the Carrier Cost Systems (CCS) include the number of DALs in the count of pieces?*
- b. *Unless your answer to part a is an unqualified negative, would the DALs be recorded as letter-shaped or flat-shaped pieces?*
- c. *Would the CCS include the number of wraps in the count of pieces?*
- d. *Unless the answer to preceding part c is an unqualified negative, would the wraps be recorded as letter-shaped or flat-shaped pieces?*

**Response:**

- a. Yes.
- b. Almost invariably, the DAL would be counted as a letter in the city carrier system. In the rural carrier cost system, almost invariably, the DAL would be counted either as an "Other Letter" or a boxholder, depending on the address format on the DAL.
- c. Yes.
- d. In the city carrier system wraps would almost invariably be counted as flats. In the rural carrier system wraps would almost invariably be counted as boxholders.

## DECLARATION

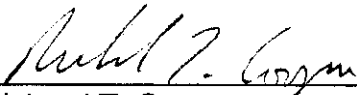
I, Thomas W. Harahush, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Thomas W. Harahush

Date: 12-12-01

## 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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