

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 UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS, INC. AND VAL-
PAK DEALERS' ASSOCIATION REDIRECTED FROM WITNESS KINGSLEY
(VP/USPS-T39-54-55, 57-60)

The United States Postal Service hereby provides the responses to the following interrogatories of Val-Pak Direct Marketing Systems, Inc. and Val-Pak Dealers' Association redirected from Witness Kingsley: VP/USPS-T39-54-55, 57-60, filed on November 30, 2001. VP/USPS-T39-56, also redirected from Witness Kingsley, has been answered by the Postal Service under separate cover.

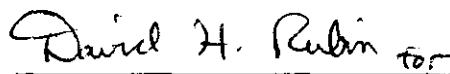
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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December 14, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS, INC.
REDIRECTED FROM WITNESS KINGSLEY**

VP/USPS-T39-54 Please assume that, on a particular day, a Destination Delivery Unit ("DDU") has no Standard ECR Saturation mailings of flats, but it has received one Standard ECR Saturation letter mailing, entered at the DDU, for delivery that day (or the next).

- a. If the DDU is not one that receives mail in delivery point sequence ("DPS") from the processing and distribution center ("P&DC"), and does not have a Carrier Sequence Bar Code Sorter ("CSBCS"), what is the likelihood that carriers on foot routes or park and loop routes will either (i) take the Saturation letter mailing directly to their routes as a "third" bundle, or (ii) sort the Saturation letters manually in the office?
- b. If the DDU is among those that receive DSP'd mail from the P&DC, what is the likelihood that carriers on foot routes or park and loop routes will either (i) take the Saturation letter mailing directly to their routes as a "third" bundle; (ii) sort the Saturation letters manually in the office; or (iii) send the Saturation letter mailing back to the P&DC to be DPS'd?
- c. In explaining your answers to parts a and b, please state whether the Postal Service has a relevant policy or practice.

Response:

- (a) (i) None. Technically they could, but in reality, this seldom happens. (ii) This is what carriers on foot or park and loop routes are most likely to do.
- (b) (i) and (ii) Same as (a). (iii) It is a local decision based on whether it could be accomplished within the service standards and the mail's machinability.
- (c) There is no established policy.

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VP/USPS-T39-55 Please assume, on a particular day, a DDU has one Standard ECR Saturation mailing of addressed flats (e.g., catalogs), and it also has received one Standard ECR Saturation letter mailing, entered at the DDU, both for delivery that day. In answering the following questions, please explain the rationale for how such decisions are made, and state whether the Postal Service has a relevant policy or practice.

- a. If the DDU is not one that receives DPS'd mail from the P&DC, what is the likelihood that carriers on foot routes or park and loop routes will (i) take only the Saturation flat mailing directly to their routes as a "third" bundle, or (ii) take only the Saturation letter mailing directly to their routes as a "third" bundle, or (iii) take both Saturation mailings directly to the route as "extra" bundles?
- b. If the DDU is not one that receives DPS'd mail from the P&DC, what is the likelihood that carriers on mounted routes will (i) take only the Saturation flat mailing directly to their routes as a "third" bundle, or (ii) take only the Saturation letter mailing directly to their routes as a "third" bundle, or (iii) take both Saturation mailings directly to the route as "extra" bundles?
- c. If the DDU is among those that receive DPS'd mail from the P&DC, what is the likelihood that carriers on foot routes or park and loop routes will (i) take only the Saturation flat mailing directly to their routes as a "third" bundle, or (ii) take only the Saturation letter mailing directly to their routes as a "third" bundle, or (iii) take both Saturation mailings directly to the route as "extra" bundles, or (iv) defer the Saturation letter mailing until the next day and send it back to the P&DC to be DPS'd, or (v) do something else?
- d. If the DDU is among those that receive DPS'd mail from the P&DC, what is the likelihood that carriers on mounted routes will (i) take only the Saturation flat mailing directly to their routes as a "third" bundle, or (ii) take only the Saturation letter mailing directly to their routes as a "third" bundle, or (iii) take both Saturation mailings directly to the route as "extra" bundles, or (iv) defer the Saturation letter mailing until the next day and send it back to the P&DC to be DPS'd, or (v) do something else?

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Response:

- (a) (i) Assuming letters are cased, the flats most likely would be taken as a third bundle.
- (ii) Not likely to occur.
- (iii) Would not be likely. There could be a few exceptions since this would be a local call.
- (b) (i) Most likely.
- (ii) Very unlikely.
- (iii) It is possible that both could be taken as extra bundles.
- (c) (i) Most prevalent.
- (ii) Not at all.
- (iii) Not likely.
- (iv) Possible. See VP/USPS-T39-54, b, iii.
- (v) Nothing else is possible.
- (d) (i) The carrier definitely would do assuming the letters are cased.
- (ii) Would not occur.
- (iii) Could do.
- (iv) Same as in (c) iv.
- (v) No.

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VP/USPS-T39-57 Do city carriers sort all or some detached address labels ("DALs") on all non-curblines delivery portions of their routes under the following facts:

- a. If the portion of a carrier's route that is curblines is 75 percent, would the carrier not sort the DALs for that portion of the route?
- b. If the portion of a carrier's route that is curblines is 50 percent, would the carrier not sort the DALs for that portion of the route?
- c. If the portion of a carrier's route that is curblines is 25 percent, would the carrier not sort the DALs for that portion of the route?
- d. Please describe in detail all circumstances when carriers would not sort DALs in the office.

Response:

- (a) The DALs would most often be cased. At times, only the non-curblines portion of the DALs could be cased. This is a local management decision.
- (b) It is likely that the DALs would all be cased.
- (c) It is likely that the DALs would all be cased. It is a local management decision.
- (d) There is no one circumstance where DALs would not be sorted.

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VP/USPS-T39-58

- a. How does the Postal Service describe whatever it is that the current Carrier Route Vehicles use to hold flats? As a "flat tray?" A flat "tub?" A holding tub? Something else?
- b. How many flat trays (or for flats whatever is equivalent to a holding letter tray) do the current Carrier Route Vehicles have?
- c. As a practical matter, what is the largest number of "extra bundles" of Saturation flats that a carrier can take directly to the route without in-office sortation? That is, since carriers do not get up from their seat and retrieve mail pieces from Saturation mailings at each delivery point, is there some point where the carrier at each stop would be extracting mail from so many different bundles that it would make more sense to sort some of the Saturation flats in the office rather than take them directly to the route as "extra bundles"?

Response:

- (a) As a "flat tray."
- (b) Whatever the daily volume warrants. It depends on daily mail volume.
- (c) Wording assumes a curblineline or mounted route. Technically there is no limit, a practical limit depends on the type of vehicle and the amount of centralized deliveries.

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VP/USPS-T39-59 Please describe how Standard ECR Saturation mailings of covers and DALs are handled on dismount routes and compare that with the way they are handled on (i) foot routes, (ii) park and loop routes, and (iii) curb routes. In responding to each question, please specify: (i) whether the DALs are sorted in the office, or are taken directly to the route unsorted, and (ii) whether there is any limit on the number of extra bundles of Saturation ECR Mail that the carrier can take to the route unsorted.

Response:

On dismount routes, there is no need for the carrier satchel and there is no bundle limit.

(i) and (ii) See responses to 54a, 55(a and c), and 57

(iii) Same as on dismount routes.

**RESPONSE OF UNITED STATES POSTAL SERVICE
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VP/USPS-T39-60 Please assume that on some particular day the carriers at a DDU have two Standard ECR Saturation mailings of flats to be delivered that day. Assume further that many of the routes served by the DDU are foot routes or park and loop routes, and that carriers on those routes will need to case one of the two mailings of Saturation flats prior to leaving the office. Assume further that a typical route for this office has 480 delivery points. Finally, assume that the "first" Saturation mailing is approximately 3/32nds of an inch thick and the "second" is 5/32nds of an inch thick.

- a. Please confirm that 480 pieces of the first mailing, stacked one on top of another, will measure about 3.75 linear feet. If you do not confirm, please provide the correct amount.
- b. Please confirm that 480 pieces of the second mailing, stacked one on top of another, will measure about 6.25 linear feet. If you do not confirm, please provide the correct amount.
- c. For a standard vertical flat case used by city carriers, what is the interior width that is available for each residential delivery point on the route?
- d. When city carriers are using standard vertical flat cases, would thicker mailpieces tend to fill up the available space more quickly than thinner mailpieces?
- e. Of the two mailings described above, which would city carriers most likely take to their vehicles as a third bundle, and which would they most likely sort while in the office?

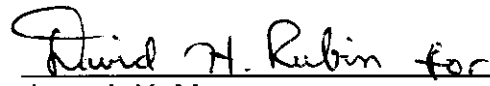
Response:

There are no rules or polices. Logic would dictate.

- (a) Confirmed. It is easier to case thinner pieces with existing mail.
- (b) It would be taken directly to the street since it takes up extra case space.
- (c) Recommend one-inch slot per address. It could be one-half inch or possibly more than one inch depending on the volume for that delivery point.
- (d) Yes.
- (e) See responses to subparts (a) and (b).

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.



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December 14, 2001