

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  
TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS, INC. AND  
VAL-PAK DEALERS' ASSOCIATION, INC. REDIRECTED FROM  
WITNESS KINGSLEY  
(VP/USPS-T39-61, 62, 64-68)

The United States Postal Service hereby provides the responses to the following interrogatories of Val-Pak Direct Marketing, Inc. and Val-Pak Dealers' Association, Inc. redirected from witness Kingsley: VP/USPS-T39-61, 62, 64-68, filed on December 10, 2001. An objection to interrogatory VP/USPS-T39-63 was filed on December 20, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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December 26, 2001

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**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.

**Response:**

The minimum standard rate is 18 which is the base upon which carriers are measured and routes are evaluated. In day to day operations, it is very likely that carriers could case walk sequence DALs faster than the minimum.

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**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.

**Response:**

The minimum standard rate is 8 which is the base upon which carriers are measured and routes are evaluated. In day to day operations, *if* the flats are cased it is very likely that carriers could case walk sequence "wraps" or "covers" faster than the minimum.

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**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?

**Response:**

- a. No.
- b. There is no limit to the number of apartment type mailboxes in any one location.

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**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 Curblin 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 Curblin 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?

**Response:**

- a. Yes. Also includes dismount portions of routes.
  
- b. This is determined by local circumstances and varies by office and route.

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**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.

**Response:**

The number of extra bundles carried is a determination based on a number of elements such as the size of the mailings, the total route volume for the day, and the size of the carriers route. The size and type of vehicle could become a factor in deciding on the number of extra bundles a carrier might take on a given day. Those rural routes that have postal provided vehicles utilize Long Life Vehicles. Those routes that utilize privately owned vehicles tend to use intermediate or full size vehicles.

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**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?

**Response:**

- a. At the start of FY 2000, approximately 143,000 city routes and 31,900 rural routes were on DPS.
- b. The end of the year statistics were approximately equal to the beginning of the year data for city routes. The reporting system used to monitor the data is being

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redesigned. Therefore, exact numbers are not available for city routes. There were approximately 37,700 rural routes on DPS at the end of FY 2000.

- c. At the beginning of FY 2000 there were approximately 24,000 city routes and 32,800 rural routes not on DPS.
- d. At the end of FY 2000 there were an estimated 25,000 city routes and 29,700 rural routes not on DPS.
- e. – h. Possible delivery stops served by DPS are not available.



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**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.

**Response:**

- a. Yes.
- b. There is no prescribed process; it is a local decision. The carrier can decide to return to the vehicle to replenish the satchel for the remainder of the loop.

## 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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