

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

POSTAL RATE AND FEE CHANGES, 2005)

Docket No. R2005-1

VALPAK DIRECT MARKETING SYSTEMS, INC. AND
VALPAK DEALERS' ASSOCIATION, INC.
FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS JEFFERY W. LEWIS (VP/USPS-T30-1-20)
(April 22, 2005)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Valpak Direct Marketing Systems, Inc. and Valpak 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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April 22, 2005

VP/USPS-T30-1.

Please refer to your testimony (USPS-T-30) at page 3, lines 1-3. In Base Year 2004, what was the total number of city carrier (i) foot routes and (ii) park and loop routes where carriers could not be required to carry more than one “third bundle” on the street?

VP/USPS-T30-2.

Please refer to your testimony at page 3, lines 8-10. In Base Year 2004, what was the total number of city carrier motorized routes delivering to “curbline, centralized, cluster box unit (CBU), and dismount stops” where carriers had no restrictions on the number of “third bundles” they could take directly to the street?

VP/USPS-T30-3.

Please refer to your responses to preceding interrogatories VP/USPS-T30-1 and 2 and indicate whether the total number of routes provided in response to those two questions was the total number of city carrier delivery routes in Base Year 2004. In the event that the number of routes provided in response to those two questions does not account for the total number of city carrier delivery routes, please indicate the total number of such routes and explain the difference.

VP/USPS-T30-4.

Please assume that on some particular day a city carrier has one ECR Saturation sequenced mailing for delivery that day. With the understanding that carriers may have some

discretion concerning whether they case a sequenced mailing while in the delivery unit, what percent of the time would you expect the carrier to take such a sequenced Saturation mailing (uncased) directly to the route? If your response depends on the type of route, please provide a separate response for each route type(s) for which there is a distinction regarding the way such a Saturation mailing is likely to be handled. Similarly, if your response depends on whether the sequenced mailing consists of letters, addressed flats, or unaddressed flats with Detached Address Labels (“DALs”), please provide a separate response for each shape for which there is a distinction regarding the way such a Saturation mailing is likely to be handled.

VP/USPS-T30-5.

Please assume that a city carrier on a motorized route has two ECR Saturation flat mailings for delivery on a certain day, each sequenced to line of travel. For the purpose of your response to the following question, assume that volume on that day ranges from “light” to “normal” and deferral of one of the mailings is not a consideration. With the understanding that carriers on motorized routes have discretion concerning whether they case a sequenced mailing while in the delivery unit or take sequenced mailings directly to their vehicles, what percent of the time would you expect the carrier to take both of the sequenced flat mailings (uncased) directly to the vehicle?

- a. Unless you always anticipate that the carrier would take both sequenced mailings directly to the vehicle, please indicate the more important reasons that would lead the carrier on a motorized route to case one of the sequenced flat mailings in the office.

- b. Please explain in detail what you mean by “check and withdraw” in your testimony at page 3, line 15.

VP/USPS-T30-6.

Please assume that a city carrier on a motorized route has at the Destination Delivery Unit (“DDU”) two ECR Saturation mailings for delivery on a certain day, each sequenced to line of travel, and one of the mailings consists of Saturation letters, while the other consists of Saturation flats. For the purpose of your response to the following question, please assume that deferral of one of the mailings is not a consideration, including the deferral that would occur if the letters were sent back to the plant to be delivery point sequenced (“DPS”). With the understanding that such carriers have discretion concerning whether they case the mail while in the delivery unit or take sequenced mailings directly to their vehicles, what percent of the time would you expect the carrier to take the sequenced mailings of Saturation flats and letters (uncased) directly to the vehicle? Unless you always anticipate that the carrier would take both sequenced mailings directly to the vehicle, please indicate the reasons that would lead the carrier on a motorized route to case one of the sequenced mailings in the office.

VP/USPS-T30-7.

At page 3 of your testimony (ll. 12-13), you note that “[t]he additional bundles carriers take to the street save a considerable amount of in-office time.” At the same time, you also note (ll. 14-16) that “carriers must check and withdraw mail ... from each of the additional bundles taken directly to the street,” which implies that a trade-off exists between in-office

time saved and street time added. With respect to the potential for saving in-office time, please answer the following questions:

- a. Does the Postal Service have any studies or analysis of the **actual** amount of time required to case an ECR Saturation mailing of **addressed** flats, such as catalogs? If so, please provide those results. Further, if the analysis shows how casing time varies depending on physical characteristics, such as weight or size, or whether the piece is tabbed or untabbed, please provide that information.
- b. Does the Postal Service have any studies or analysis of the **actual** amount of time required to case an ECR Saturation mailing of **unaddressed** flats? If so, please provide those results. Further, if the analysis shows how casing time varies depending on physical characteristics, such as weight or size, number of inserts in the host piece, size of the host piece, etc., please provide that information.
- c. Does the Postal Service have any studies or analysis of the **relative** amount of time required to case an ECR Saturation mailing of **unaddressed** flats in comparison to the time required to case an ECR Saturation mailing of **addressed** flats? If so, please provide those results.

VP/USPS-T30-8.

Please refer to VP/USPS-T30-7. With respect to the time required for carriers to “check and withdraw mail ... from each additional bundles taken directly to the street,” please answer the following questions:

- a. Aside from the testimony of Postal Service witness Acheson in Docket No. C87-2, does the Postal Service have any subsequent studies or analysis of the **actual** amount of time required to check and withdraw an addressed flat, such as a catalog, from an extra bundle? If so, please provide those results. Further, if the analysis shows how the time varies depending on physical characteristics, such as weight or size, or whether the piece is tabbed or untabbed, please provide.
- b. Does the Postal Service have any studies or analysis of the **actual** amount of time required to check and withdraw a DAL and an unaddressed flat from an extra bundle? If so, please provide those results. Further, if the analysis shows how casing time varies depending on physical characteristics, such as weight or size, number of inserts in the host piece, size of the host piece, etc. please provide.
- c. Does the Postal Service have any studies or analysis of the **relative** amount of time required to check and withdraw a DAL and an unaddressed flat in comparison to the time required to check and withdraw an addressed flat? If so, please provide those results.

VP/USPS-T30-9.

At page 3 of your testimony (ll. 12-13), you note that “[t]he additional bundles carriers take to the street save a considerable amount of in-office time.” At the same time, you also note (ll. 14-16) that “carriers must check and withdraw mail...from each of the additional

bundles taken directly to the street.” This latter statement confirms the testimony of Postal Service witness Acheson in Docket No. C87-2, and implies that a trade-off exists between in-office time saved and street time added.

- a. With respect to your discussion concerning additional bundles of sequenced mail, what evidence does the Postal Service have that the in-office time saved exceeds the extra street time required to check and withdraw mail from extra bundles?
- b. For motorized routes with no restriction on the number of bundles that city carriers can take directly to the street, what is the largest number of additional sequenced bundles (in addition to the normal bundles of DPS letters and cased flats) that, as a practical matter, carriers can handle in their vehicles? That is, is there some number of additional sequenced bundles beyond which it becomes more practical, or more cost-effective, to case some sequenced mailings in the office?

VP/USPS-T30-10.

As a hypothetical, please assume that a city carrier had only one Standard ECR Saturation mailing to deliver on a particular day (along with the normal volume of other mail), and that Saturation mailing consisted of letter-shaped mail sequenced by line of travel (“LOT”).

- a. Does the Postal Service have in place a standard policy or procedure that prescribes how city carriers should handle letter-shaped Standard ECR Saturation mailings under such circumstances?
- b. If your answer to preceding part a is the affirmative, please provide copies of all relevant policies or procedures issued by headquarters.
- c. If your answer to preceding part b is anything other than an unqualified affirmative:
 - (i) What is the likelihood that the carrier would take the letter-shaped Standard ECR Saturation mailing presorted to LOT directly to the carrier's vehicle and would treat the letters as a "third" bundle?
 - (ii) What is the likelihood that the letter-shaped Standard ECR Saturation mailing would be sent to the plant to be DPS with other letter-shaped mail?

VP/USPS-T30-11.

The following assumptions involve a hypothetical. First, please assume that on some particular day carriers at a DDU have two Standard ECR Saturation flat mailings to deliver, along with the usual assortment of other mail. Second, assume that the volume of mail for delivery that day is normal, and carriers will have no problem delivering both of the two Saturation mailings. Third, assume carriers operating out of this DDU can take only one of the two Saturation mailings to the street as a third bundle; *i.e.*, they have either foot routes or park and loop routes. Fourth, assume the two mailings are addressed catalogs having the same

dimensions (length and height), but differing with respect to weight (and thickness), as follows: one of the two Saturation mailings is a catalog weighing 2.5 ounces, while the other is a catalog weighing 5.0 ounces.

- a. Of the two Saturation flat mailings, is either more likely to be taken to the route as a third bundle, or would each one have an equal probability of being taken?
- b. Has the Postal Service issued any written instructions establishing the order or priority for implementing the third bundle option on foot routes and park and loop routes? If so, please provide a copy of all applicable instructions (i) that were in effect during the Base Year and (ii) that are now in effect.
- c. If the Postal Service has not issued any written instructions establishing the order or priority for implementing the third bundle option, do DDU's have any general instructions or understanding concerning the priority? If so, please provide a copy.

VP/USPS-T30-12.

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 the routes served by the DDU either 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 measurement.
- 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 measurement.
- 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, please confirm that 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 case while in the office?

VP/USPS-T30-13.

Although DALs are not required to be pre-barcoded, it seems conceivable that some mailers nevertheless might barcode their DALs voluntarily.

- a. Is this ever known to occur?
- b. If so, what is the best estimate of the percentage of DALs that are pre-barcoded?
- c. Would having barcodes on DALs facilitate processing? Please explain.

VP/USPS-T30-14.

- a. Are the specifications for DALs such that they could be processed on Delivery Bar Code Sorters (“DBCSs”), Carrier Sequence Bar Code Sorters (“CSBCSs”), or other automation equipment if the Postal Service so desired? That is, do the thickness, height, length, etc. of DALs conform with the specifications for processing on the Postal Service’s automation equipment?
- b. Can the Postal Service apply barcodes to DALs by running them through the various pieces of automation equipment that are equipped with Optical Character Readers (“OCRs”)?
- c. If Standard ECR flats with DALs are entered at a destinating Processing and Distribution Center (“P&DC”), or upstream of a destinating P&DC, to what extent is automation equipment likely to be used to sort the DALs into delivery point sequence?
- d. Unless the answers to preceding parts of this interrogatory are to the effect that DALs are never sorted on automation equipment, of those DALs that are sorted on automation equipment, please provide your best estimate of the percentage of DALs that are pre-barcoded, and the percentage of DALs that the Postal Service must first barcode before sorting on automation equipment.

VP/USPS-T30-15.

- a. When Standard ECR flats with DALs are entered at DDU, are the DALs sometimes returned to the P&DC to be DPS on automation equipment?

- b. If so, please describe the circumstances under which this is likely to occur, and indicate whether pre-barcoding of DALs is a significant consideration in whether they are processed on automation equipment?

VP/USPS-T30-16.

- a. To what extent and under what circumstances are DALs sorted with other letter-shaped mail (*i.e.*, whether cased manually or by automation equipment)?
- b. Approximately what percentage of DALs are sorted with letter-shaped mail?
- c. To what extent and under what circumstances are DALs cased with flat-shaped mail?
- d. Approximately what percentage of DALs are sorted with flat-shaped mail?
- e. When DALs are cased with flat-shaped mail, and carriers subsequently “finger” pieces in the flat-shaped bundle while on their routes, do carriers ever encounter any difficulty in not seeing or not finding the DALs between larger-sized flats?

VP/USPS-T30-17.

- a. Do carriers always leave the DDU with DALs sorted with either their letter mail or their flat mail?
- b. Unless your answer to preceding part a is an unqualified affirmative, under what circumstances would carriers take DALs to their route separately (*i.e.*, along with the accompanying mailpieces), without any sortation whatsoever?

- c. If carriers sometimes take DALs directly to their route without any sortation whatsoever, how often is this likely to occur?

VP/USPS-T30-18.

- a. Does the Postal Service allow unaddressed letter-shaped mail to be accompanied by DALs? If not, why not?
- b. Does the Postal Service allow unaddressed enveloped flats to be accompanied by DALs? If not, why not?
- c. Does the Postal Service allow unaddressed catalogs to be accompanied by DALs? If not, why not?

VP/USPS-T30-19.

As a hypothetical, please assume that carriers on foot routes or park and loop routes (*i.e.*, carriers that are restricted to three bundles) are faced with the following situation: (i) four Saturation mailings of Standard ECR unaddressed flats (consisting of host pieces with untabbed inserts) with DALs are entered at the DDU during the day on a Monday, (ii) none of these mailings have any requested day of delivery, and (iii) the volume of mail in the DDU for delivery on the next day (Tuesday) is “light.”

- a. Will one of the DAL mailings be taken on Tuesday as a third bundle and the flat-shaped pieces in the three other DAL mailings be cased manually and also delivered on Tuesday?

- b. Unless the answer to preceding part a is an unqualified affirmative, please describe the most likely procedure for handling these four mailings in terms of (i) day of delivery, and (ii) whether the mailings will be cased manually or taken directly to the route as bundles without being cased. Please feel free to make whatever further assumptions you consider necessary in order to provide a responsive answer to this interrogatory, stating explicitly each such further assumption that you deem necessary and appropriate.

VP/USPS-T30-20.

Please refer to your testimony at page 6, where you describe the Piece Count Recording System (“PCRS”), and state (ll. 10-12) that “[t]he PCRS also improved and standardized procedures for measuring and converting mail handled outside the automated mailstream.” Assume that a carrier with 550 possible stops receives an unaddressed Saturation mailing (consisting of host pieces with untabbed inserts) with DALs, and these Saturation pieces cover between 90 and 100 percent of the stops.

- a. Please describe how these pieces and the accompanying DALs would be counted in the PCRS.
- b. Would the carrier do a physical count to verify the actual number of DALs?
- c. If there were 525 DALs, and the carrier took those plus 525 host pieces to the route, would the PCRS record those as 1,050 pieces?