

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

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HARAUSH
TO INTERROGATORY OF VALPAK DIRECT MARKETING SYSTEMS, INC.
AND VALPAK DEALERS' ASSOCIATION, INC.,
REDIRECTED FROM WITNESS BRADLEY
(VP/USPS-T14-8)
(June 2, 2005)

The United States Postal Service hereby provides the response of witness Harahush to an interrogatory of Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc.: VP/USPS-T14-8, filed on May 19, 2005, and redirected from witness Bradley.

The interrogatory is stated verbatim, followed by the response.

Respectfully submitted,
UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF POSTAL SERVICE WITNESS THOMAS W. HARAUSH TO
INTERROGATORY OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
REDIRECTED FROM WITNESS MICHAEL D. BRADLEY

VP/USPS-T14-8. At pages 58-59 of your testimony, you state that “the Carrier Cost System measures delivery-point sequenced mail separately and an estimate of the amount of ECR Saturation mail that is DPS can be directly obtained” (p. 58, l. 24 through p. 59, l. 2). Please explain how, given some measured or counted volume of delivery point sequenced (“DPS”) letters, you can directly obtain the volume of ECR Saturation letters contained in that DPS volume.

RESPONSE:

Section 3.2.1.6 of USPS-LR-K-21, Handbook F-65, Data Collection User’s Guide for Cost Systems, TL-2, explains what DPS mail is. Section 3.2.1.6 refers the data collector to sections 3.6 and 3.7 for instructions on how to key class and subclass of a sampled mailpiece. With respect to counting DPS mail as a separate shape, please refer to the first file in USPS-LR-J-34, SP Letter 1 for FY 2000, which was filed in Docket No. R2001-1.

Estimation of volume for all rate categories of mail is explained in USPS-LR-K-11, the statistical and computer documentation for the city carrier cost system. Specifically, DPS letters are referred to in Layouts 6 (the “Z” file) and 8 (the “Lotus” file).