

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268B0001

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

Docket No. R2005-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SHAW
TO INTERROGATORIES OF VALPAK DIRECT MARKETING SYSTEMS, INC.
AND VALPAK DEALERS' ASSOCIATION, INC.,
(VP/USPS-T2-22-23)
(June 14, 2005)

The United States Postal Service hereby provides the responses of witness Shaw to interrogatories of Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc.: VP/USPS-T2-22-23, filed on June 1, 2005.

Each interrogatory is stated verbatim, followed by the response.

Respectfully submitted,
UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083, Fax -3084

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SHAW
TO INTERROGATORY OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
AND VALPAK DEALERS' ASSOCIATION, INC.

VP/USPS-T2-22. Please assume that a group of Standard ECR Saturation letters is being delivery point sequenced, that one or more of these letters causes a machine jam, and that, during the time any such jammed piece is being removed from the machine, an In-Office Cost System ("IOCS") tally is taken. Would that tally and the costs associated with that tally, be charged to Saturation letters? If not, please explain.

RESPONSE:

Yes, if at the time of the IOCS reading the sampled employee is removing the jammed piece from the machine. If the sampled employee is not removing the jammed piece and is not handling mail but mail is present on the machine then Rule 7 in the IOCS Handbook F-45 (USPS-LR-I-14/R2000-1, page 12-4) is used to obtain a mailpiece from the machine's source of supply.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SHAW
TO INTERROGATORY OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
AND VALPAK DEALERS' ASSOCIATION, INC.

VP/USPS-T2-23. How many IOCS tallies taken in the delivery point sequence MODS pool indicate a machine jam at the time the tally is taken?

RESPONSE:

In FY2004 there were 13 IOCS tallies that indicated a machine jam during a delivery point sequence mail processing operation. If "MODS pool" in the interrogatory is referring to cost pool, then it is my understanding that 10 of these tallies are in cost pool BCS/DBCS for plants (please see USPS-LR-K-55/R2005-1, page I-13) and 3 of the tallies are in cost pool AUTO/MECH for Post Offices, Stations, and Branches (please see USPS-LR-K-55/R2005-1, page II-25).