

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 POSTAL SERVICE WITNESS STEVENS
TO INTERROGATORIES OF VALPAK (VP/USPS-T14-11, 14.b),
REDIRECTED FROM WITNESS BRADLEY
(June 23, 2005)

The United States Postal Service hereby provides the response of witness Stevens to the following interrogatories of ValPak, filed on June 9, 2005, and redirected from witness Bradley: VP/USPS-T14-11, 14.b.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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June 23, 2005

Response of Postal Service Witness Dennis P. Stevens
To Interrogatories Posed by VALPAK
Redirected from Witness Michael D. Bradley

VP/USPS-T14-11.

Please identify the precise point at which city carrier in-office activities end and at which your City Carrier Street Time Study ("CCSTS") begins to track carrier time with respect to handling of third bundles. For example, is any of the time spent by a carrier in transporting mail to and loading a vehicle measured by the CCSTS, or is this considered inoffice time?

Response:

Street activities for the CCSTS commence with a *Leave Office* scan; simultaneously, in-office activities cease. For your example, the time is considered in-office time - assuming that the time spent transporting mail to and loading a vehicle occurs *at the office* prior to the *Leave Office* scan.

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VP/USPS-T14-14.

In order to determine the unit volume variable city carrier street cost for each rate category of sequenced mail, it is necessary to divide the costs apportioned to each rate category by the respective volumes of "Sequenced Mail" in each rate category. Your testimony at page 18, line 16, to page 19, line 14, discusses the measurement of volume only briefly and generally.

b. Sequenced Saturation ECR flats either may be stand-alone pieces, such as addressed catalogs, or may consist of two pieces — namely, a separate unaddressed piece and an addressed DAL, both of which must be retrieved in order to complete delivery. When surveyed carriers counted the volume of Sequenced Mail in your study, did they include both DALs and the accompanying flat in their mail count? If not, please explain why not, since DALs were counted separately in the previous methodology, which you discuss elsewhere in your testimony.

Response:

b. Yes. All delivered mail was recorded. All DAL mail that was cased was included in the cased letter/flat count. Any DAL mail that was not cased was included in the total for the sequenced count. Thus, where the DAL is not cased the sequenced mail count includes both the count for the host and the DAL piece.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Eric P. Koetting

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