

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

POSTAL RATE AND FEE CHANGES, 2006)

Docket No. R2006-1

VALPAK DIRECT MARKETING SYSTEMS, INC. AND
VALPAK DEALERS' ASSOCIATION, INC.
FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS JOYCE K. COOMBS (VP/USPS-T44-1-8)
(May 23, 2006)

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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VP/USPS-T44-1.

Please refer to your testimony at page 9, lines 2-4, where you describe how Flat Sequencing Systems (“FSS”) will introduce an additional bundle on a regular basis. Is it correct that when FSS becomes operational, carriers on a regular basis will have: (i) a bundle of DPS’d letters; (ii) a bundle of FSS’d flats; and (iii) a bundle of residual letters and flats that the carrier has cased manually? If this is not what is expected in the FSS environment, please explain fully the bundles with which a carrier is expected to have on a regular basis when departing from the DDU.

VP/USPS-T44-2.

- a. Please refer to your testimony at page 6, lines 16-20. Do you anticipate that the FSS being developed and tested in Carmel, Indiana, and that is expected to be deployed starting in 2008, will be able to sequence unbound ECR “wraps” whether they have either:
 - (i) an address label affixed;
 - (ii) an address printed on them; or
 - (iii) are unaddressed, accompanied by a DAL?
- b. Unless your response to all subsections of preceding part a is an unqualified affirmative, how would such wraps need to be modified in order to make them machinable on the FSS?

VP/USPS-T44-3.

This question concerns (i) your testimony at page 13, lines 2-3, which notes that casing host piece flats “would be logistically more challenging than simply casing the letter-shaped DAL cards,” and (ii) your testimony at page 9, lines 7-8, which notes that “carriers on walking sections of routes are restricted in the number of bundles that they can carry and deliver.”

- a. When carriers with walking sections of routes have one or more bundles of **addressed** ECR “wraps” for delivery, is it your expectation that they will case the wraps along with the residual letters and flats that the carrier also must case manually? If this is not your expectation, how do you expect addressed, non-machinable wraps to be handled by carriers that are restricted in the number of bundles that they can carry and deliver?
- b. When carriers with walking sections of routes have one or more bundles of **unaddressed** ECR “wraps” for delivery, accompanied by **DALs**, is it your expectation that they will case both the wraps and the DALs along with the residual letters and flats that the carrier also must case manually? If this is not your expectation, how do you expect unaddressed, non-machinable wraps and DALs to be handled by those carriers that are restricted in the number of bundles that they can carry and deliver?

VP/USPS-T44-4.

Please refer to your testimony at page 13, lines 6-7, where you state that “[e]xperience in today’s delivery units suggests that the sequenced flat-shaped pieces will be taken directly to the street **in most cases.**” (Emphasis added.)

- a. Please elaborate on what you mean by the expression “in most cases.”
- b. Please confirm that city carrier routes are divided into four categories:
 - (i) walking, (ii) park & loop, (iii) curblines, and (iv) dismount, depending by the general nature of the route. If you do not confirm, please explain how they are categorized.
- c. Specifically, for approximately what percentage of delivery points on city carrier routes will sequenced flat-shaped pieces likely not be taken directly to the street?
- d. What is the percentage of all city carrier routes that contain one or more segments where carriers are restricted in the number of bundles that they can carry and deliver?
- e. What is the percentage of each of the following types of city routes that contain one or more segments where carriers are restricted in the number of bundles that they can carry and deliver:
 - (i) walking,
 - (ii) park & loop,
 - (iii) curblines, and
 - (iv) dismount

- f. For those delivery points on city carrier routes where sequenced flat-shaped pieces are not likely to be taken directly to the street, would the presence of a DAL be likely to simplify the delivery operation and reduce the cost? Please explain why, or why not.

VP/USPS-T44-5.

Please refer to your testimony at page 13, lines 16-18, where you note that in “the presence of two sets of saturation flats on the same delivery day ... the two sets of flats would most likely be collated....” For purposes of your response to this interrogatory, please assume that a city carrier who is not restricted as to the number of bundles that can be carried, has two mailings of DALs and unaddressed flats (*i.e.*, “wraps”) that must be delivered on the same day.

- a. Please describe how the carrier would handle the two sets, or bundles, of DALs accompanying the flats.
- b. Would city carriers ever collate the two bundles of DALs into a single bundle, and then take that collated bundle of DALs directly to the street?
- (ii) Would city carriers case one bundle of DALs and take the other bundle of DALs to the street as an extra bundle?
- (iii) Would city carriers case both bundles of DALs?
- (iv) Under what conditions would one or both of the bundles of DALs be DPS'd?

- c. Assuming that the Postal Service and city carriers have more than one way of handling two sets of DALs on the same day, please indicate the two or three most likely ways.
- d. For those city carriers who are not restricted as to the number of bundles they can carry, if the manner in which they would likely handle two sets of DALs on the same day depends in any way on the type or structure of the carrier's route, please explain how the route type or structure enters into the decision as to the best way to handle two sets of DALs.

VP/USPS-T44-6.

To what extent do city carriers collate DALs with their associated flats before leaving the office, and under what circumstances would they be likely to do so?

VP/USPS-T44-7.

- a. On those occasions when city carriers take DALs directly to the street as an extra bundle, please describe all differences between the way that such DALs are handled and the way that saturation letters are handled when taken directly to the street.
- b. If any such differences described in your response to the preceding part a depend on the route type, please so indicate and describe in detail how the route type affects the handling DALs and saturation letters, when each is taken directly to the street as an extra bundle.

VP/USPS-T44-8.

Please refer to Docket No. R2005-1, USPS-RT-2, page 3, lines 14-18, where witness Lewis describes the difficulties that city carriers encounter when delivering concurrently from two letter-shaped bundles.

- a. Please explain whether the difficulties that are described by witness Lewis apply equally to DALs that are taken directly to the street as an extra bundle.
- b. If the problems described by witness Lewis do not apply equally, please explain fully why not.