

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS COOMBS
TO INTERROGATORIES OF VALPAK. (VP/USPS-T44-1 – 8)
(June 6, 2006)

The United States Postal Service hereby provides the response of witness Coombs to the following interrogatories of ValPak, Inc., filed on May 23, 2006:

VP/USPS-T44-1 – 8.

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 6, 2006

RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO INTERROGATORIES OF VALPAK

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.

RESPONSE:

Yes, on those route sections where bundles are required, the carrier is generally expected to have a bundle of DPS letters, a bundle of FSS flats, and a combined bundle of manually cased residual letters and flats in the FSS environment.

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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 machineable on the FSS?

RESPONSE:

- a. ECR saturation flat-shaped mail will continue to be processed as it is today although the Postal Service may put saturation mail on the FSS machine in cases where it is determined that it is operationally efficient.
- b. Refer to my response in part a.

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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-machineable 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-machineable wraps and DALs to be handled by those carriers that are restricted in the number of bundles that they can carry and deliver?

RESPONSE:

- a. (i) In the current environment, carriers with one bundle of addressed ECR wraps generally carry them as a third bundle. If there is more than one bundle of ECR wraps, the additional bundle will be deferred to the next day when possible. If it is not possible, the two bundles of ECR wraps will be collated. (ii) If this refers to the environment after FSS is implemented, the data analysis has not yet been completed and no final decision has been made.
- b. (i) In the current environment, carriers with one bundle of unaddressed ECR wraps generally carry them as a third bundle. If there is more than one bundle of ECR wraps, the additional bundle will be deferred to the

next day if possible. If it is not possible, the two bundles of ECR wraps will be collated. (ii) If this refers to the environment after FSS is implemented, the data analysis has not yet been completed and no final decision has been made.

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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 unit suggests that sequenced flat-shaped pieces will be taken directly to the street in most cases.”

- 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:
(i) walking, (ii) park & loop, (iii) curblines, (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.

RESPONSE:

- a. It is more likely than not.
- b. City carrier routes are generally divided into these categories: Curblines, Foot, Park and Loop, Dismount, and Other
- c. These data are unavailable since they are determined by operational constraints and efficiencies at the local delivery units. No studies have been completed that provide this data. However, Witness Lewis testified in Docket R2005-1, USPS-RT-2, page 5, lines 12-16, that the actual number of deliveries affected by the third bundle restriction is less than

44.3 percent. No further data is available.

d., e. See my response to c.

f. It is generally operational policy that for all delivery points, ECR saturation flat mailings will be taken directly to the street. This would be an issue only when conflicts occur.

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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 the 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.

RESPONSE:

- a. The manager of the unit would determine how the multiple sets of DALs would be handled in order to provide the maximum operational efficiency for the unit.
- b. Generally, they would not.
 - (ii) It is possible that they would.
 - (iii) It is possible that they would.

- (iv) Operational constraints would determine if one or both would be DPSd.
- c. Among the possible methods, the two or three most likely include: Casing one DAL and taking the other DAL directly to the street, casing both DALs, and taking both DALs to the street.
 - d. For carriers who are not restricted, the type and structure of the route usually does not enter into the decision.

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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?

RESPONSE:

It is unlikely that a city carrier would collate the DAL with the associated flat.

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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 of DALs and saturation letters, when each is taken directly to the street as an extra bundle.

RESPONSE:

- a. The differences would largely depend on the operational constraints of the letter-shaped saturation mailing. The size, shape, and weight of the letter pieces generally determine how the mailing is handled to provide maximum operational efficiency.
- b. See my response to a.

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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.

RESPONSE:

- a. Yes, they generally do.
- b. See my response to a.

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.

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