

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-T44-23 - 26, 30 - 33)  
(July 24, 2006)

The United States Postal Service hereby provides the response of witness Coombs to the following interrogatories of ValPak, Inc., filed on July 10, 2006: VP/USPS-T44-23 - 26, 30 - 33. Questions 27 - 29 have been redirected to witness Kelley (USPS-T-30).

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

---

Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2992, FAX -5402  
July 24, 2006

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO  
INTERROGATORIES OF VALPAK**

**VP/USPS-T44-23.**

On rural routes, when mailers submit a saturation mailing using a simplified address:

- a. Is the mail piece required to have a barcode?
- b. If so, is it a 5-digit, 9-digit, or 11-digit barcode?

**RESPONSE:**

I am not a classification expert, but since simplified address pieces do not have a name or address, they probably do not have a barcode.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO  
INTERROGATORIES OF VALPAK**

**VP/USPS-T44-24.**

Can saturation letters for delivery on a rural route with a simplified address by DPS'd, or must they always be sorted manually?

**RESPONSE:**

Saturation letters for delivery on a rural route do not have a name or address, so they cannot be DPS'd.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO  
INTERROGATORIES OF VALPAK**

**VP/USPS-T44-25.**

Will the Postal Service be able to sort on the FSS machineable saturation flats for delivery on a rural route with a simplified address?

**RESPONSE:**

The data from the testing of FSS has not been analyzed, and no information is currently available.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO  
INTERROGATORIES OF VALPAK**

**VP/USPS-T44-26.**

Are saturation mailings permitted to use a simplified address for all rural routes, or is use of a simplified address restricted in any way?

**RESPONSE:**

Simplified address mail is received for delivery on rural routes and non-city delivery post office boxes.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO  
INTERROGATORIES OF VALPAK**

**VP/USPS-T44-30.**

Please refer to your response to VP/USPS-T44-17(a), and please discuss the nature of the “operational restrictions” referred to in your response, and supply two or three examples of the operational restrictions to which you refer.

**RESPONSE:**

The operational restrictions that I was referring to are the capacity for a carrier on a motorized route to deliver from more trays/bundles that can safely fit in the delivery area of the vehicle and where the carrier can safely access them.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO  
INTERROGATORIES OF VALPAK**

**VP/USPS-T44-31.**

Please refer to your response to VP/USPS-T44-17(B), and assume that the two sets of saturation flats which (i) had to be delivered on the same day, and (ii) were taken directly to the street, consisted of unaddressed covers and DALs. Please discuss how the carrier would most likely handle the DALs—i. e., case both sets of DALs, take both sets of DALs to the street as extra bundles, or case one set and take the other set to the street as an extra bundle.

**RESPONSE:**

This question is almost identical to VP/USPS-T44-13(b). As I stated in that response, all of the options are viable. It would depend on operational conditions.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO  
INTERROGATORIES OF VALPAK**

**VP/USPS-T44-32.**

Please refer to your response to VP/USPS-T44-18(b), and explain in more detail what you mean by your reference to “the logistical constraints of the vehicle.”

**RESPONSE:**

The “logistical constraints of the vehicle” that I was referring to are the capacity for a carrier to load the vehicle in a manner that allows the carrier to deliver the mail safely.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO  
INTERROGATORIES OF VALPAK**

**VP/USPS-T44-33.**

Please refer to your response to VP/USPS-T44-22.

- a. Assuming that a mailing of saturation letters comports fully with the DMM size restrictions on letters, what size or shape of letter envelope would be incompatible with a bundle of DPS mail?
- b. Would a number 10 envelope be incompatible with a bundle of DPS mail?
- c. Are you aware of saturation letter mailings that are incompatible with a bundle of DPS mail?
- d. Based on your experience, what percent of saturation letter mailings would be incompatible with a bundle of DPS mail?
- e. When city delivery carriers elect to put saturation letters in their satchel, do they encounter difficulty working with a bundle of saturation letters in their satchel? If so, please describe the nature of the problem.

**RESPONSE:**

- a. A saturation letter that is thick enough to constantly require the carrier to reload the mail in his/her hand that is being carried in conjunction with DPS mail.
- b. Generally not. However, if the thickness of the envelope required the carrier to constantly have to reload the mail in his/her hand, it could be.
- c. Yes.
- d. No studies have been conducted, and my experience does not suggest any particular percentage.
- e. No.

## 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

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2992, FAX: -5402  
July 24, 2006