

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
MARTIN CZIGLER TO INTERROGATORIES OF ADVO, INC.
ADVO/USPS-T1-1-3

The United States Postal Service hereby provides the responses of witness Martin Czigler to the following interrogatories of the ADVO, Inc.: ADVO/USPS-T1-1-3, filed on July 12, 2006.

Each interrogatory is stated verbatim and followed by the response:

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Kenneth N. Hollies
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083; Fax -3084
khollies@usps.gov
(July 26, 2006)

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN CZIGLER
TO INTERROGATORY OF ADVO**

ADVO/USPS-T1-1. Please provide definitions for the following, including an explanation of the type of mail typically found in them:

- (a) Tall pallet boxes
- (b) Westpaks
- (c) Postalpaks

RESPONSE:

Tall pallet boxes are pallet boxes that are so tall that the data collector cannot view their contents. Postal Paks are a type of reusable tall pallet box that can be latched to their underlying pallet. WestPaks are a type of reusable short pallet box that can be latched to their underlying pallet. My understanding is that many types of mail and mail containers can be found in all of these types of pallet boxes, including NMOs, sacks, trays and tubs.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN CZIGLER
TO INTERROGATORY OF ADVO**

ADVO/USPS-T1-2. With respect to the pieces within a container handled by a clerk or mail handler that are considered countable (answers yes to Q24b):

- (a) Does the tally taker then proceed to Q24? If so, does this mean that, if the container (for example a hamper) includes some smaller containers (e.g., trays, tubs, sacks), all the mail in the container is counted but the number and type of smaller containers included within the single larger container are not counted? Please explain.
- (b) Are the instructions in Q23 (on mail piece characteristics other than shape and subclass) used in some way when responding to Q24? If so, please explain.

RESPONSE:

- a) Yes, the question following Q24b is Q24. All of the mail in the container is counted, including the mail in any containers inside. Note that the IOCS-CODES data entry software does not ask Q24b or Q24 for wheeled containers, such as hampers in the example.
- b) No.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN CZIGLER
TO INTERROGATORY OF ADVO**

ADVO/USPS-T1-3. In Q21G1, the tally taker is to identify the percentage of container space filled with the various options.

(a) For bundle(s) (option f), is there a subsequent shape identified for those bundles?

(b) If Q21G1 is intended to identify what a particular container includes, why are pallets (option k) and con-cons (option g) included as options?

RESPONSE:

a) No.

b) Many container types, including Air Cargo containers, BMC-OTRs, or nutting trucks, can hold other containers such as pallets or con-cons.