

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 ELIANE VAN-TY-SMITH (VP/USPS-T11-1-5)  
(June 20, 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-T11-1.**

- a. Please confirm that when a carrier who is **casing** addressed ECR flat mail in the office is tallied by the IOCS, the carrier is recorded as **casing** ECR flats. If you do not confirm, please explain what would be recorded in the IOCS tally.
- b. Please refer to USPS-T-44, page 13, lines 15-19, where witness Coombs describes the practice of **collating** two sets of ECR saturation flats. When a carrier who is **collating** saturation ECR flats is the subject of an IOCS tally, does the tally indicate that the carrier was **collating** flats, or does the tally indicate that the carrier was **casing** flats? (*I.e.*, when a carrier is collating, is the tally essentially identical to the tally in preceding part a, or do IOCS tallies distinguish between (i) collating and (ii) casing of flats?)

**VP/USPS-T11-2.**

- a. When a carrier who is casing DALs in the office is tallied by the IOCS, is the carrier recorded as casing a flat, or a DAL? Please explain your answer.
- b. If your answer to preceding part a is to the effect that the tally is recorded as a flat, does the tally contain any information that could be used to indicate that the carrier in fact was casing a DAL instead of the host flat piece? Please explain your answer.
- c. When a DAL is the subject piece of an IOCS tally, does the tally contain any information that the host flat piece, whose basic characteristics such as weight and shape are unaddressed, is recorded? Please explain your answer.

**VP/USPS-T11-3.**

Please refer to your responses to preceding interrogatories, VP/USPS-T11-1 and 2.

- a. If IOCS tallies of city carriers do not distinguish between collating flats and casing flats, and also do not distinguish between casing flats and casing DALs, then:
  - (i) How accurate is the profile of carrier activities with respect to saturation flats, developed from a compilation of IOCS tallies?
  - (ii) How accurate are the estimates of volumes of DALs and flats that, respectively, are cased and collated, when such estimates are based on or derived from IOCS tallies?
- b. When one cannot tell from IOCS tallies whether carriers were (i) collating flats in lieu of casing flats, or (ii) casing DALs in lieu of casing flats, please describe how one develops a meaningful estimate of the coefficient of variation, or any other pertinent measure of dispersion and statistical uncertainty for the volume of saturation flats that carriers actually case.

**VP/USPS-T11-4.**

- a. For letter-shaped pieces that are DPS'd on Delivery Bar Code Sorter ("DBCS") equipment, please describe how the Postal Service determines the volumes of each subclass that are run through the DBCS.

- b. If DALs should in fact sometimes be DPS'd on DBCS equipment, and a DAL were the subject of an IOCS tally taken during the DPS operation, would it be recorded as a letter or as a flat?
  - (i) If a DAL were to be recorded as a flat, would not it be somewhat anomalous for the IOCS tally to indicate that a flat was being processed on a letter sorting machine? Please explain why or why not.
  - (ii) Does the Postal Service have an edit procedure for IOCS tallies that attempts to find and either delete or somehow correct those IOCS tallies that appear on their face to be anomalous? Please explain your answer.
- c. Please refer to the testimony of witness McCrery, USPS-T-42, page 12, line 27 to page 13, line 1.
  - (i) Assuming that a significant number of DALs in fact are DPS'd on DBCS equipment (as indicated by witness McCrery), do you know of any way that IOCS tallies can be used to estimate the volume of DALs that are DPS'd? If so, please explain.
  - (ii) If your answer to preceding part (i) is negative, what data, or information sources, could the Postal Service use to estimate the volume of DALs that are DPS'd?

**VP/USPS-T11-5.**

When IOCS tallies are taken on letter-shaped pieces being DPS'd, does the Postal Service have any plans to change the IOCS so as to distinguish, or otherwise identify, DALs explicitly?