

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-T44-34.c, d. – 35)
(July 28, 2006)

The United States Postal Service hereby provides the response of witness Coombs to the following interrogatories of ValPak, Inc., filed on July 14, 2006: VP/USPS-T44-34.c., d. – 35. Parts a. and b. of Question 34 have been redirected to the Postal Service.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 28, 2006

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VP/USPS-T44-34.

An article "Mail Goes Where the Money Is," by Marshall Kolin and Edward J. Smith, in *Emerging Competition in Postal and Delivery Services* (Kulwer Academic Publishers, 1999), pages 159-179, indicates that higher volumes of mail, on a per capita basis, are delivered in areas where residents have higher-than-average incomes. The FY2005 Billing Determinants (USPS-LR-L-77) indicate that the total volume of saturation mail was 13.8 billion pieces (both letters and flats).

- a. Does the Postal Service maintain records that indicate the concentration of mail by Zip code? If so, please provide.
- b. Does the Postal Service maintain any records that indicate the concentration of ECR saturation mail by Zip code area? If so, please provide.
- c. On the basis of your experience, do some Zip code areas receive saturation mail rarely, if ever? If so, please indicate some identifying characteristics of such areas.
- d. Your testimony at page 13, lines 15-19, notes that:

There are obviously situations that currently exist where flats are not taken directly to the street such as the presence of two sets of flats on the same delivery day.

On the basis of your experience, do some Zip codes receive a disproportionately large number of ECR saturation mailings, including two such mailings on the same day? If so, please describe some identifying characteristics of such areas.

RESPONSE:

- a., b. Redirected to the Postal Service
- c., d. From my experience, I would agree that ECR saturation mailings are not uniformly distributed over all Zip codes. Some of the characteristics of the areas that receive disproportionately higher numbers of these mailings include high-volume, high-income areas. Conversely, low-volume with lower income areas tend to receive less of these types of mailings.

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VP/USPS-T44-35.

Please refer to your response to VP/USPS-T30-8(a) (redirected from witness Kelley, (USPS-T-30).

- a. If it is generally easier to case flats-shaped pieces that are enveloped or bound in some manner than it is to case a piece that is considered a wrap or host piece, as you assert, then would it be reasonable to infer that a wrap or host piece offers the Postal Service less flexibility with regard to handling methods than do enveloped or bound pieces? Please explain your answer.
- b. Comparing enveloped flats with wraps of the same weight, are wraps just slightly more difficult to case, or are wraps considerably more difficult to case? Please explain your answer.
- c. Comparing stapled (bound) catalogs with wraps of the same weight, are catalogs just slightly more difficult to case than wraps, or are wraps considerably more difficult to case? Please explain your answer.

RESPONSE:

- a. In my experience, I would answer by saying that the flexibility and methods of handling either a wrap or a bound flat-shaped piece are determined more by the individual piece type than by the category. In the response cited, I said that it is generally easier to case enveloped or bound pieces. It is not always easier as the ease of casing is often determined by the structure of the wrap or the bound piece.
- b., c. In my experience, the structure of the wrap or host piece and the structure of the catalog or enveloped flat-shaped piece would determine if it was slightly or considerably more difficult to case.

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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