

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 McCRERY
TO INTERROGATORY OF VALPAK DIRECT MARKETING SYSTEMS, INC. AND
VALPAK DEALERS' ASSOCIATION, INC.
(VP/USPS-T44-36),
REDIRECTED FROM WITNESS COOMBS
(August 11, 2006)

The United States Postal Service hereby provides the response of witness McCrery to the above-listed interrogatory of Valpak, filed on July 28, 2006, redirected from witness Coombs.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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VP/USPS-T44-36.

Please refer to witness McCrery's response to ADVO/USPS-T42-1 and your response

to ADVO/USPS-T42-19, redirected from witness McCrery. Witness McCrery, in his response to ADVO/USPS-T42-1, stated that 5-Digit Pallets with CR bundles or sacks are cross-docked for transportation to the delivery unit. Your response to ADVO/USPS-T42-1 states that 66 percent of post offices, stations, branches, delivery distribution centers, and carrier annexes cannot handle pallets.

a. If 66 percent of delivery units are not capable of handling pallets, why are the pallets cross-docked at the destination processing plant to those delivery units without the pallet handling capability?

b. At those delivery units not capable of handling pallets, how are the pallets handled?

Response:

(a-b) In the cases where a delivery unit cannot handle a pallet, the contents of the pallet would be transferred into a different, delivery unit-compatible container (e.g., rolling stock) at the plant. However, it is my experience that delivery units that cannot handle pallets tend to be smaller offices, and plants rarely receive direct pallets prepared by customers intended for final delivery at such smaller offices. Customers are not allowed to deposit pallets directly into delivery units that are unable to accept pallets and therefore are required to manually offload the contents of the pallet into a container provided by the delivery unit at these locations.