

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 SCOTT J. DAVIS (VP/USPS-T47-1-2)
(May 12, 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-T47-1.

Please refer to USPS-T-47, Attachment 1, page 8, Table 6, R2006-1 USPS Library References.

- a. Please identify the authors, as well as others who have materially contributed to substantive aspects of the preparation or development, of Appendix H (Calculating Postal Product Costs: Marginal Costs) and Appendix I (Calculating Postal Product Costs: Incremental Costs) of USPS-LR-L-1, Summary Description of USPS Development of Costs by Segments and Components, Fiscal Year 2005.
- b. Please identify any witness or witnesses sponsoring Appendix H (Calculating Postal Product Costs: Marginal Costs) and Appendix I (Calculating Postal Product Costs: Incremental Costs) of USPS-LR-L-1, Summary Description of USPS Development of Costs by Segments and Components, Fiscal Year 2005.
- c. If your response to preceding part b identifies more than one witness as sponsoring Appendix H (Calculating Postal Product Costs: Marginal Costs) and Appendix I (Calculating Postal Product Costs: Incremental Costs) of USPS-LR-L-1, please indicate the part sponsored by each witness.
- d. Please identify each witness who relies on any part of Appendix H (Calculating Postal Product Costs: Marginal Costs) and Appendix I (Calculating Postal Product Costs: Incremental Costs) of USPS-LR-L-1, Summary Description of USPS Development of Costs by Segments and Components, Fiscal Year 2005.

VP/USPS-T47-2.

Please refer to USPS-T-47, Attachment 1, page 9, Table 6, R2006-1 USPS Library References.

- a. Please identify the authors, as well as others who have materially contributed to substantive aspects of the preparation or development, of USPS-LR-L-77, FY2005 Billing Determinants.
- b. Please identify any witness or witnesses sponsoring USPS-LR-L-77, FY2005 Billing Determinants.
- c. If your response to preceding part b identifies more than one witness as sponsoring USPS-LR-L-77, please indicate the part sponsored by each witness.
- d. Please identify each witness who relies on any part of USPS-LR-L-77, FY2005 Billing Determinants.