

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 BRADLEY V. PAFFORD (VP/USPS-T3-1-4)
(June 22, 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-T3-1.

Please refer to your testimony (USPS-T-3) at page 6, lines 13-17.

- a. Do bulk mailing postage statements for Standard Mail, which you mention on line 17, now contain information on the volume of DALs entered by mailers? If not, on what form or forms is such information recorded?
- b. Will information on the volume of DALs entered by mailers be **collected** as part of the Bulk Revenue, Pieces and Weight System (“BRPW”) which you discuss in Section IV of your testimony (USPS-T-3, pp. 6-8)? If not, will information on the volume of DALs be **collected** under any of the other data systems discussed in your testimony?
- c. Will information on the volume of DALs entered by mailers be **reported** on a regular basis as part of the BRPW which you discuss in Section IV, starting at page 6, of your testimony? If not, please indicate whether information on the volume of DALs will be part of one or more routine **reports** developed from any of the other data systems discussed in your testimony.

VP/USPS-T3-2.

- a. Is your organizational unit, Revenue and Volume Reporting, Finance (USPS-T-3, p. ii, l. 7), responsible for compiling data on the volume of DALs that mailers enter with the Postal Service? If not, what organizational unit is responsible for compiling data on the volume of DALs that mailers enter with the Postal Service?

- b. Does any Postal Service witness in this case come from an organizational unit that has more responsibility for compiling data on the volume of DALs that mailers enter with the Postal Service than your organizational unit? If so, who would that witness be?

VP/USPS-T3-3.

- a. Will data on the volume of DALs that mailers enter with the Postal Service be compiled quarterly, along with other BRPW data? If not, how often will data on the volume of DALs that mailers enter with the Postal Service be compiled?
- b. If data on the volume of DALs that mailers enter with the Postal Service is compiled quarterly, will such data be published in conjunction with other RPW data that are reported quarterly?

VP/USPS-T3-4.

Please refer to the response of the Postal Service to VP/USPS-T30-3(b)-(d), redirected from witness Kelley.

- a. Did the Postal Service in fact require mailers using DALs to use new postage statements, effective April 3, 2005?
- b. If your answer to preceding part a is negative, please (i) explain why not, and (ii) state when mailers of DALs in fact did start using the new postage statements.

- c. If your answer to preceding part a is affirmative, or if mailers started using the new postage statements before March 2006, please explain what happened to data on DALs since mailers started using the new postage statements. That is:
 - i. Were the data compiled and, if so, where are they recorded?
 - ii. If the data were not compiled, why not?