

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INSTITUTIONAL INTERROGATORY FROM
VALPAK DIRECT MARKETING SYSTEMS, INC. AND
VALPAK DEALERS' ASSOCIATION, INC.
VP/USPS-2(C-D)
(July 24, 2006)

The United States Postal Service hereby objects partial to interrogatory VP/USPS-2(c), which reads, in pertinent part:

VP/USPS-2.

Please refer to the response to VP/USPS-T3-4, redirected to the Postal Service from witness Pafford.

* * *

c. Please provide an estimate of the volume of DALs for the five months from May 2006 through September 2006, as soon as it can be made available.

d. If analysis of the volume of DALs during any of the months within the period May 2006 through September 2006 can be generated prior to the hearings on the Postal Service case-in-chief (currently scheduled to begin August 2, 2006), please provide that analysis by such date.

The Postal Service objects to the form of these questions, which attempt to erect a continuing obligation that could eventually extend beyond all current discovery deadlines.

However, the Postal Service is prepared to respond as if the final clause of part (c), "as soon as it can be made available," does not exist. As is evident from the interrogatory responses identified in the main body of the interrogatory together with the planned responses to other parts of VP/USPS-2, more information regarding DAL volumes is becoming available. The planned response to part (c), assuming the absence of that final clause, will be that the requested information is not available. However, a response to part (d) can provide some additional data at this time.

Should more of the requested DAL information become available before the Postal Service's obligation to update interrogatory responses concludes, it can then be provided.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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