

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

POSTAL RATE AND FEE CHANGES, 2005)

Docket No. R2005-1

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-T4-1)
(May 3, 2005)

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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May 3, 2005

VP/USPS-T4-1.

Since the implementation of the rates recommended in Docket No. R2001-1, the Postal Service charges Standard Regular and Standard ECR letter-shaped mail that weighs between 3.3 and 3.5 ounces both a piece and pound charge. In essence, such letter-shaped mail pays the minimum per-piece letter rate plus the pound rate for all “excess” weight between 3.3 and 3.5 ounces. Pieces that qualify for this rate are sometimes referred as “heavy-weight” letters.

- a.
 - (i) When such heavy-weight letters are entered with the Postal Service, does the Revenue, Pieces and Weight (“RPW”) system consistently record the volume of such pieces as letters or nonletters?
 - (ii) Is it possible that such heavy-weight letters are sometimes recorded as letters, and sometimes as nonletters in the RPW system?
 - (iii) What was the actual volume of such heavy-weight letters recorded by the RPW system in Base Year 2004?
- b. When such heavy-weight letters are entered with the Postal Service, does the RPW system record the revenue from such pieces as being derived from letters or from nonletters?