

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

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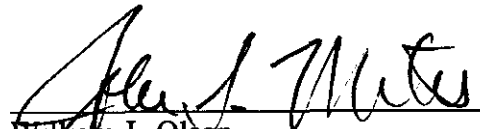
POSTAL RATE AND FEE CHANGES, 2000)

MAR 20 3 31 PM '00
Docket No. R2000-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

VAL-PAK DIRECT MARKETING SYSTEMS, INC.,
VAL-PAK DEALERS' ASSOCIATION, INC., AND
CAROL WRIGHT PROMOTIONS, INC.
FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS HERBERT B. HUNTER (VP-CW/USPS-T5-1-7)
(March 20, 2000)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Val-Pak Direct Marketing Systems, Inc., Val-Pak Dealers' Association, Inc., and Carol Wright Promotions, 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,



William J. Olson

John S. Miles

WILLIAM J. OLSON, P.C.

8180 Greensboro Drive, Suite 1070

McLean, Virginia 22102-3860

(703) 356-5070

Counsel for:

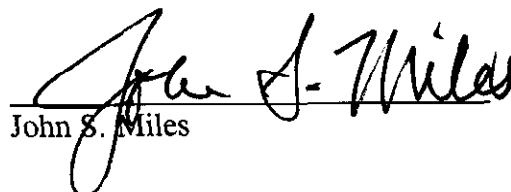
Val-Pak Direct Marketing Systems, Inc.,

Val-Pak Dealers' Association, Inc., and

Carol Wright Promotions, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.



John S. Miles

March 20, 2000

VP-CW/USPS-T5-1.

This interrogatory pertains to a Standard A detached address label ("DAL") mailing where the dimensions of the accompanying mailpiece are nonletter-shaped.

- a. If an IOCS tally is taken when a clerk is casing the DALs, does the tally indicate that the clerk is handling a letter or a nonletter? That is, are the in-office mail processing costs associated with this tally charged to letters or nonletters?
- b. When the revenues, volumes and weights of the mailing are recorded from Form 3601, are the revenues, volumes and weights recorded under the letters or nonletters category?
- c. What effort does the Postal Service make to assure that the costs of processing DAL mailings are recorded or measured in a manner that is consistent with the way revenues, volumes and weights are recorded? Please provide citations to all documents or instructions that support your answer.

VP-CW/USPS-T5-2.

Does the Postal Service have any data or information that shows the revenue, pieces and weight of Standard A Mail that was entered with DALs in FY 1998? If so, please provide the revenue, pieces and weight of DAL mailings by subclass, by rate category and, if available, by shape.

VP-CW/USPS-T5-3.

For those Standard A letter-shaped pieces that weigh in excess of the breakpoint and pay the nonletter rate:

- a. Are the revenues, volumes and weight of such pieces recorded in the RPW system as letters or nonletters?
- b. When an IOCS tally is taken of a clerk who is handling one or more overweight Standard A letter-shaped pieces that was entered at the rate for nonletters, does the tally indicate that the clerk is handling a letter or a nonletter? That is, are the mail processing costs for such pieces recorded and measured in a manner that is consistent with the way revenues, pieces and weight are recorded?
- c. What effort does the Postal Service make to assure that the costs of handling overweight Standard A letter-shaped pieces are recorded in a manner that is consistent with the way revenues, pieces and weight are recorded? Please provide citations to all documents or instructions that support your answer.

VP-CW/USPS-T5-4.

For Standard A Mail, are there any differences between the way revenue, volume and pieces data in the RPW system were recorded in FY 1998 and the 1998 Billing Determinants? If so, please discuss and explain fully.

VP-CW/USPS-T5-5.

For Standard A Mail, are there any differences between the way revenue, volume and pieces data are recorded in (i) the RPW system and/or the Billing Determinants, and (ii) the PERMIT system? If so, please state all differences and explain why each item is tracked differently.

VP-CW/USPS-T5-6.

For your response to this question, please refer to ADVO/USPS-T28-1. Please cite all instances in the testimony, workpapers and library references submitted with the Postal Service's filing in this Docket where FY 1998 volume data for Standard A Mail differ from those reported in the RPW system and the 1998 Billing Determinants, and explain fully why different volume data are used.

VP-CW/USPS-T5-7.

Interrogatories VP-CW/USPS-T5-1 and 3 above asked you to discuss possible differences in (i) the way revenue pieces and weight of Standard A Mail are recorded in the RPW system and (ii) the way costs of such mail are recorded in the IOCS. Aside from the two specific instances referred to in those interrogatories, please list all other instances of which you are aware where data recorded for revenue, pieces and weight may diverge or have some different classification from data recorded for IOCS tallies (and costs developed from those tallies).