

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

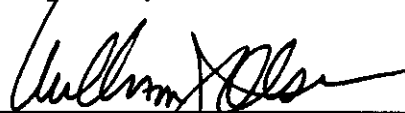
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POSTAL RATE COMMISSION  
DOCKET NO. R2000-1 IN  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000 )

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 MAURA ROBINSON (VP-CW/USPS-T34-1)  
(March 22, 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,



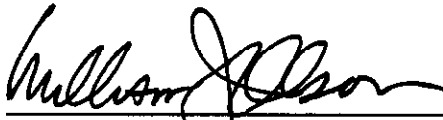
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McLean, Virginia 22102-3860  
(703) 356-5070

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 by the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

  
William J. Olson

March 22, 2000

**VP-CW/USPS-T34-1.**

- a. Please refer to your response to APMU/USPS-T34-19. Please confirm that, in Priority Mail rate design, the difference in the rate for an item mailed to zone L, 1, 2, 3, and an item mailed to, say, zone 6, reflects distance-related transportation cost plus contingency plus markup. Please provide a detailed explanation for any nonconfirmation.
- b. Please confirm that the difference in the rate for pound-rated Standard A Mail entered at, say, a DSCF, and the same mail entered at a OMBC reflects only costs avoided by the Postal Service, without any contingency or markup, which costs in turn may be multiplied by a passthrough of less than 100 percent. Please provide a detailed explanation for any nonconfirmation.
- c. Please explain why this different treatment between subclasses (*i.e.*, cost plus contingency plus markup in one instance, and less than 100 percent of costs avoided in the other) is (i) fair and equitable, (ii) consistent, and (iii) smart business for the Postal Service.
- d. Please refer to your response to APMU/USPS-T34-32.
  - (i) What different approaches to marking up distance-related transportation costs for Priority Mail did you discuss with Postal Service management?
  - (ii) What led you to retain the method used in this docket?