

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

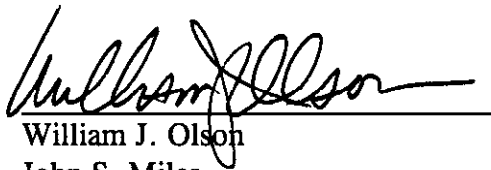
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Docket No. R2000-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000)

VAL-PAK DIRECT MARKETING SYSTEMS, INC.,
VAL-PAK DEALERS' ASSOCIATION, INC., AND
CAROL WRIGHT PROMOTIONS, INC.
FOURTH INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS JOSEPH D. MOELLER (VP-CW/USPS-T35-26)
(March 23, 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.

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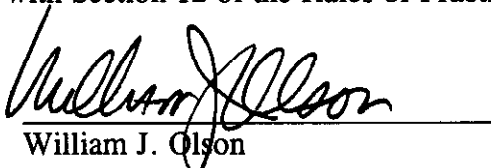
Val-Pak Direct Marketing Systems, Inc.,

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.



William J. Olson

March 23, 2000

VP-CW/USPS-T35-26.

Please refer to your testimony at page 24 (ll. 3-6) where you state “[p]arcel-shaped pieces are excluded from ECR unless they are merchandise samples, so the only surchargeable pieces are merchandise samples. Pieces of these dimensions are also required to use Detached Address Labels (DALs), so, merchandise samples with DALs are the only surcharged pieces.” You also state at page 23 (l. 17) that the ECR residual shape surcharge “is equivalent to the net surcharge on Regular barcode-discounted parcels.”

- a. Do all DALs accompanying ECR parcels qualify for the barcode discount?
Please explain your answer.
- b. If the DALs to an ECR mailing currently lack barcodes, what happens to the mailing? For example:
 - (i) Is it deferred?
 - (ii) Does the Postal Service refuse to accept it?
 - (iii) Does the Postal Service run the DALs through an OCR and generate a barcode?
- c. Will the treatment of such DAL ECR mailings change in the Test Year environment (or, “when the docket is implemented?”)?
- d. Was the ECR parcel surcharge rate set on the expectation that all DALs accompanying ECR parcels would already qualify for the barcode discount in the Test Year?