

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

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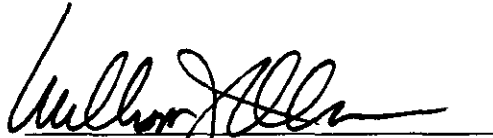
POSTAL RATE AND FEE CHANGES, 2000)

APR 25 3 35 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 (VP-CW/USPS-1)
(April 25, 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 these interrogatories and requests for production of documents.

Respectfully submitted,



William J. Olson

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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.



William J. Olson

April 25, 2000

VP-CW/USPS-1.

The table below shows Test Year Before Rates volumes for Standard A ECR. The total volumes are the same, but they differ substantially with respect to the details. Please reconcile the TBYSR volumes of letter and non-letters as developed and used by witnesses Daniel (USPS-T-28) and Moeller (USPS-T-35).

Standard A ECR			
Test Year Before Rates Volumes			
(millions)			
	<u>Daniel</u>		<u>Moeller</u>
Letters	13,127.962	Letters	10,799.400
Non-letters:		Non-letters:	
Flats	20,455.078	Pc-rated	13,953.781
Parcels	<u>47.477</u>	Lb-rated	<u>8,877.336</u>
TOTAL	33,630.517		33,630.517

Sources: Witness Daniel (USPS-T-28), USPS-LR-I-92, pages 16, 19-22.
 Witness Moeller (USPS-T-35), USPS-LR-I-166, WP1, page 4.