

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

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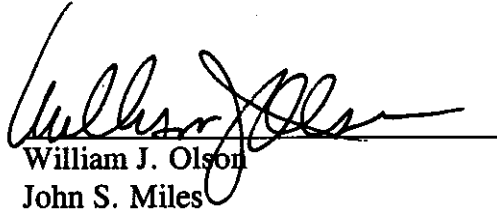
POSTAL RATE AND FEE CHANGES, 2000)

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

VAL-PAK DIRECT MARKETING SYSTEMS, INC.
VAL-PAK DEALERS' ASSOCIATION, INC., AND
CAROL WRIGHT PROMOTIONS, INC.
FOLLOW-UP INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS TO UNITED STATES POSTAL SERVICE (VP-CW/USPS-2)
(May 19, 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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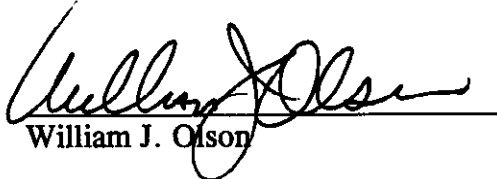
Val-Pak Direct Marketing Systems, Inc.

Val-Pak Dealers' Association, Inc., and

Carol Wright Promotions, Inc.

CERTIFICATE OF SERVICE

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



William J. Olson

May 19, 2000

VP-CW/USPS-2

Please refer to VP-CW/USPS-1. That interrogatory asked for a reconciliation of the estimated Test Year Before Rates volumes of Standard A ECR letters used by witnesses Daniel and Moeller, 13,127.962 million versus 10,799.400 million, respectively. The response to that prior interrogatory stated, in part, that:

The Daniel letter volume is based on the actual shape of the piece, regardless of weight, and is based on a base year figure that is factored up to the forecasted Test Year volume total. The Moeller letter volume is directly from the volume forecast and is limited to letter-shaped pieces below the breakpoint weight.

- a. Please confirm that USPS-LR-I-92, Section 2, page 16, gives witness Daniel's estimated letter volumes by ounce, as follows:

<u>Ounces</u>	<u>Volume</u>
0 - 1	10,031,706,524
1 - 2	1,845,146,634
2 - 3	<u>1,034,725,613</u>
Subtotal	12,911,578,771
Over 3 ounces	<u>216,382,951</u>
Total	13,279,961,722

- b. Please reconcile witness Daniel's estimate of 12,911.579 million letters that weigh not more than 3.0 ounces with witness Moeller's estimate of 10,799.400 million letters below the 3.3 ounce breakpoint.

- c. Please confirm:
- (i) Witness Moeller's volume forecast of 10,799.400 million appears in USPS-LR-166, W.P. 1, page 4, Column 1;
 - (ii) The reference on page 4 is to W.P. 1, page 3, which shows corresponding letter volumes, and indicates that the source is USPS-T-6, Table 1 at page 5; and
 - (iii) The forecast in USPS-T-6, Table 1, does not forecast letter and non-letter volumes separately.
- d. Please provide an exact reference indicating where the forecast for letter volumes used by witness Moeller in USPS-LR-I-166 (shown below) can be found, provide the original sources for the data in that forecast, and reconcile those data with witness Daniel's volume data for letters.

<u>ECR Letters</u>	<u>Volume (000)</u>
Automation	1,891,225
Basic	5,665,732
High-Density	411,860
Saturation	<u>2,830,582</u>
Total	10,799,400