

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

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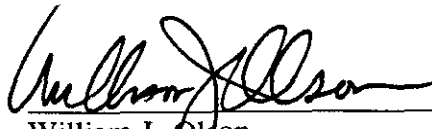
POSTAL RATE AND FEE CHANGES, 2000)

Docket No. R2000-1
OFFICE OF THE SECRETARY

ERRATUM TO RESPONSE OF VAL-PAK DIRECT MARKETING SYSTEMS, INC.,
VAL-PAK DEALERS' ASSOCIATION, INC., AND
CAROL WRIGHT PROMOTIONS, INC.
WITNESS JOHN HALDI TO INTERROGATORY OF
ADVO, INC. (ADVO/VP-CW-T1-1-4(b)) (ERRATUM)
(July 17, 2000)

The attached erratum corrects a typographical error in the response to ADVO/VP-CW-T1-4(b). The corrected word is highlighted.

Respectfully submitted,

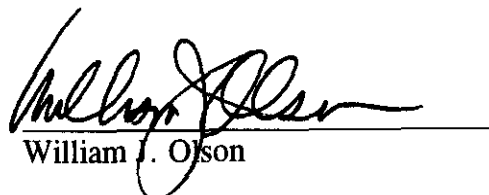


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Val-Pak Direct Marketing Systems, Inc.,
Val-Pak Dealers' Association, Inc., and
Carol Wright Promotions, Inc.

CERTIFICATE OF SERVICE

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



William J. Olson

July 17, 2000

**Response of VP-CW Witness John Haldi to Interrogatory
of Advo, Inc.**

ADVO/VP-CW-T1-4.

A comparison of Witness Daniel's and Moeller's base year 1998 volumes (in thousands) is as follows:

	LR I-92 (Daniel)	LR I-66 (Moeller)
ECR Letters	13,295,273	12,943,927
ECR Non-Letters	20,763,854	21,115,200
ECR Parcels (from LR I-102)	48,083	48,083
Total ECR Volume	34,059,127	34,059,127
ECR Flats (Non-Letters less Parcels)	20,715,771	21,067,117

- (a) Please confirm that, if witness Moeller's BY RPW volumes are correct, then witness Daniel's ECR flat volumes are understated. If you cannot, please explain why not.
- (b) Please confirm that, if witness Moeller's BY RPW volumes are correct, then witness Daniel's ECR letter volumes are overstated. If you cannot, please explain why not.

Response:

I assume that your question intends to refer to Moeller's source as USPS-LR-I-166, not as incorrectly stated, LR-I-66. On that assumption:

- (a) If witness Moeller's BY RPW ECR flat volumes are correct, then clearly witness Daniel's ECR flat volumes are understated, as the question posits. Note, however, that each witness uses different definitions; see responses to ADVO/USPS-T28-1 and VP-CW/USPS-1 and 2. Thus, on their own terms, each witness is correct.
- (b) On the assumption that witness Moeller's BY RPW ECR letter volumes are correct, then clearly witness Daniel's ECR letter volumes are overstated, as

**Response of VP-CW Witness John Haldi to Interrogatory
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the question posits. Note, however, that each witness uses different definitions; see responses to ADVO/USPS-T28-1 and VP-CW/USPS-1 and

2. Thus, on their own terms, each witness is correct.