

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

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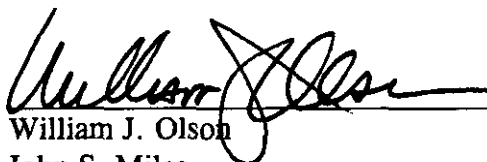
POSTAL RATE AND FEE CHANGES, 2001 )

POSTAL RATE COMMISSION  
Docket No. R2001-117

VAL-PAK DIRECT MARKETING SYSTEMS, INC.  
AND VAL-PAK DEALERS' ASSOCIATION, INC.  
FIRST INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS HERBERT B. HUNTER III (VP/USPS-T4-1-3)  
(October 2, 2001)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Val-Pak Direct Marketing Systems, Inc. and Val-Pak Dealers' Association, 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.

8180 Greensboro Drive, Suite 1070

McLean, Virginia 22102-3860

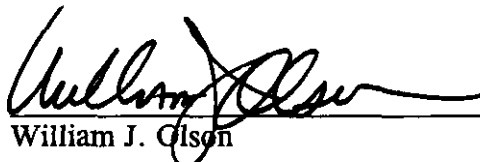
(703) 356-5070

Counsel for:

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

October 2, 2001

**VP/USPS-T4-1.**

- a. Does Postal Service Form 3602 distinguish between (i) Standard ECR flats with Detached Address Labels (“DALs”) and (ii) other Standard ECR flats?
- b. Does Form 3602 distinguish between Standard parcels with DALs and other Standard parcels?
- c. Does Form 3602 distinguish between Bound Printed Matter (“BPM”) with DALs and other BPM?
- d. If the answers to preceding parts a, b, or c are anything other than an unqualified affirmative, please explain fully what information about DAL mailings can be ascertained from Form 3602.
- e. If prior versions of Form 3602 contained such information, please describe.
- f. If other Postal Service forms contain such information, please describe.

**VP/USPS-T4-2.**

- a. Of all Standard ECR flats that were entered during Base Year, what was the volume of unaddressed flats mailed with (*i.e.*, accompanied by) DALs?
- b. Of the volume provided in response to part a, what was the volume of flats with DALs that were entered at the minimum piece rate?
- c. Of the volume provided in response to part a, what was the volume of flats with DALs that were entered at the pound rate?

- d. Please supply all sources for the data provided in response to preceding parts a, b and c.

**VP/USPS-T4-3.**

- a. Please state the average weight of Standard ECR flats that were mailed with DALs during Base Year at the minimum piece rate.
- b. Please state the average weight of Standard ECR flats that were mailed with DALs during Base Year at the pound rate.
- c. Please supply all sources for the data provided in response to preceding parts a and b.