

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R2001-1

POSTAL RATE AND FEE CHANGES, 2001 )

VAL-PAK DIRECT MARKETING SYSTEMS, INC.  
AND VAL-PAK DEALERS' ASSOCIATION, INC.  
FOURTH INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS LARAIN B. HOPE (VP/USPS-T31-25-31)  
(October 19, 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.

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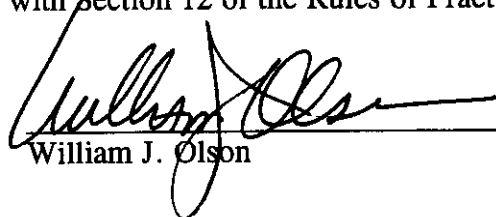
(703) 356-5070

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 19, 2001

**VP/USPS-T31-25.**

Please refer to USPS-LR-J-131, WP1, page H, tab COST. For the mail processing unit costs shown there, have you or the Postal Service computed a breakdown of the mail processing unit cost by different entry points such as BMC, SCF, and DDU? If so, please provide those data and indicate how they were derived.

**VP/USPS-T31-26.**

Please refer to USPS-LR-J-131, WP1, pages P and W, TYAR VOL and TYAR VOL CAT, respectively. For ECR pound-rated nonletters, page P shows total TYAR pounds equal to 3,010.225 (column F, row 53) and page W shows total TYAR pounds equal to 3,074.348 (column F, row 22). Please explain the difference between the total TYAR pounds for ECR pound-rated nonletters, and indicate which of the two figures is the final, correct figure.

**VP/USPS-T31-27.**

Please refer to USPS-LR-J-131, WP1, page H, tab COST.

- a. The reference for the data found in column 1 is indicated simply as "USPS-T-43 and USPS-LR-J-59." With respect to this testimony and library reference, please provide precise references (*e.g.*, page number and, if to a spreadsheet, cell references) indicating where the data in column 1 can be found.
- b. The reference for the data found in column 2 is indicated simply as "USPS-LR-J-59." Please provide a precise reference (*e.g.*, page number and, if to a

spreadsheet, cell references) indicating where the data in column 2 can be found.

**VP/USPS-T31-28.**

Please refer to USPS-LR-J-131, WP1, page F, tab TYBR SUM, spreadsheet column C, row 8. What is the source of the NECR revenues shown in the indicated cell?

**VP/USPS-T31-29.**

Please refer to USPS-LR-J-131, WP1, page G, tab DROP DIS. For footnote (1), please provide a precise reference to USPS-LR-J-68 (*e.g.*, page number and, if to a spreadsheet, cell references).

**VP/USPS-T31-30.**

Please refer to USPS-LR-J-131, WP1, page R, tab FIN SUM, spreadsheet column B, row 10. What is the source of the NECR revenues shown in the indicated cell?

**VP/USPS-T32-31.**

- a. For Base Year 2000 or FY 2001 to date, does the Postal Service have any performance data for Standard ECR Mail?
- b. If your answer to part a is anything other than an unqualified negative, please provide copies of all available data.

- c. If your answer to part a is that no data are available, when does the Postal Service expect to implement data gathering that will produce performance data for Standard ECR Mail?