

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

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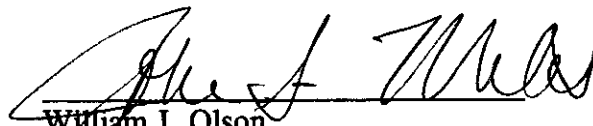
POSTAL RATE AND FEE CHANGES, 2001)

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

VAL-PAK DIRECT MARKETING SYSTEMS, INC.
AND VAL-PAK DEALERS' ASSOCIATION, INC.
SECOND INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS HERBERT B. HUNTER III (VP/USPS-T4-4-6)
(October 30, 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

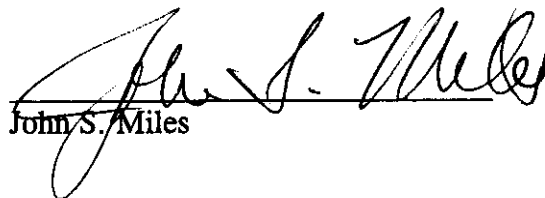
(703) 356-5070

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.



John S. Miles

October 30, 2001

VP/USPS-T4-4.

Please assume that the Postal Service receives a Standard ECR mailing consisting of detached address labels (“DALs”) and unaddressed flat-shaped “wraps.”

- a. For any portion of the mailing, does the Postal Service count the number of DALs to verify that they are equal to the number of pieces shown on Form 3602?
- b. For any portion of the mailing, does the Postal Service count the number of wraps to verify that they are equal to the number of pieces shown on Form 3602?
- c. Please assume that the number of DALs should happen to exceed the number of wraps.
 - (i) Would the basis for computing the postage be the number of DALs or the number of wraps?
 - (ii) *Under the circumstances envisioned here, would the volume recorded by the RPW system be the number of DALs or the number of wraps?*
 - (iii) What would the Postal Service do with the DALs for which there were insufficient wraps?
- d. Please assume that the number of wraps should happen to exceed the number of DALs.
 - (i) Would the basis for computing the postage be the number of DALs or the number of wraps?

- (ii) Under the circumstances envisioned here, would the volume recorded by the RPW system be the number of DALs or the number of wraps?
- (iii) What would the Postal Service do with the extra unaddressed wraps?

VP/USPS-T4-5.

Please confirm that, when the Postal Service receives a Standard ECR mailing consisting of DALs and unaddressed flat-shaped “wraps,” the RPW System attributes all revenues from that mailing to flats. If you do not confirm, please explain how the revenues are recorded.

VP/USPS-T4-6.

Please assume that the Postal Service receives a Standard ECR mailing consisting of, say, 1 million DALs and 1 million unaddressed flat-shaped “wraps.”

- a. Does the RPW System record the DALs as 1 million letter-shaped pieces? If not, what record, if any, is made of the volume of DALs?
- b. Does the RPW System record the wraps as 1 million flat-shaped pieces?
- c. Does the RPW System record the weight of the DALs and wraps combined, or does the RPW system record only the weight of the wraps? Please explain.