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POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MOELLER TO INTERROGATORY OF VAL-PAK DIRECT
MARKETING SYSTEMS, INC. AND VAL PAK DEALERS' ASSOCIATION, INC.
(VP/USPS-T32—5)**

The United States Postal Service hereby provides the response of witness Moeller to the following interrogatory of Val-Pak Direct Marketing Systems, Inc. and Val-Pak Dealers' Association, Inc: VP/USPS-T32—5, filed on October 19, 2001.


The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Anthony Alverno
Attorney

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November 2, 2001

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS, INC.
AND VAL-PAK DEALERS' ASSOCIATION**

VP/USPS-T32-5.

- a. For Base Year 2000 or FY 2001 to date, does the Postal Service have any performance data for Standard Regular 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 Regular Mail?

RESPONSE:

- a. No.
- b. N/A
- c. There currently are no plans to gather nationally representative, randomly sampled, externally validated data. Internal systems such as Advance and CONFIRM may provide an indication of performance on a mailing by mailing basis, but are dependent upon mailer participation.

DECLARATION

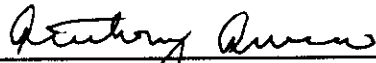
I, Joseph D. Moeller, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.


JOSEPH D. MOELLER

Dated: 11-02-01

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.



Anthony Alverno

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