

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

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Docket No. R97-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

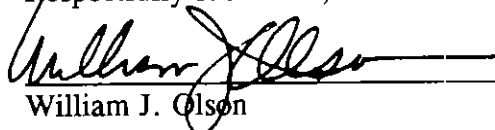
POSTAL RATE AND FEE CHANGES, 1997)

VAL-PAK DIRECT MARKETING SYSTEMS, INC.,
VAL-PAK DEALERS' ASSOCIATION, INC., AND
CAROL WRIGHT PROMOTIONS, INC

FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO POSTAL SERVICE WITNESS GEORGE S. TOLLEY (VP-CW/USPS-T6-1-4)
(August 21, 1997)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Val-Pak Direct Marketing Systems, Inc., Val-Pak Dealers' Association, Inc., and Carol Wright Promotions, Inc., d/b/a "Cox Direct," 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

Alan Woll

William J. Olson, P.C.

8180 Greensboro Drive, Suite 1070

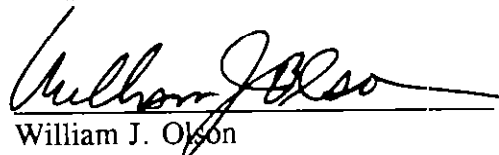
McLean, Virginia 22102-3823

(703) 356-5070

Counsel for 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 by hand delivery or mail the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.



William J. Olson

August 21, 1997

VP-CW/USPS-T6-1.

Your testimony at p. 135 discusses the volume forecast for Standard A ECR automated mail. Please define the term "automated mail" as you use it here. Specifically, are you referring to (i) ECR mail entered at the automation rate, (ii) ECR letter mail that has a preprinted barcode and is automatable (*e.g.*, letter-shape mail entered at the saturation rate, but which also has a barcode preprinted as a courtesy to the Postal Service), or (iii) something else?

VP-CW/USPS-T6-2.

Table 1 at p. 5 of your testimony shows Base Year volume for Standard A Enhanced Carrier Route mail as 29,999.206 million pieces. The RPW Report for Government Fiscal Year 1996 (dated November 11, 1996) indicates that the volume of Third-Class Bulk Regular carrier route mail was 29,204.513 million pieces. Please reconcile the difference between the data in your Table 1 and the RPW Report.

VP-CW/USPS-T6-3.

Please refer to LR-H-145, FY 1996 Billing Determinants, G-2, p. 2. Under Basic Letters, the volume entered at Automation Rate is listed as 336,502,422 thousand pieces. This amount is not included in the total shown there for Basic Letters (9,663,821,871). Your testimony at Page A-30, Appendix Table 4, lists the Base Year volume of automated Enhanced Carrier Route Letters as 1,208.395 million.

- a. Please explain and reconcile the difference between the volume of Automation Rate letters in the FY 1996 billing determinants and your Base Year volume for automated ECR letters.

- b. Please explain why the Automation Rate letters shown in the billing determinants are excluded from the total volume of Basic ECR letters, despite being listed as a component thereof.

VP-CW/USPS-T6-4.

Please refer to your Appendix Table 4, p. A-30. The Base Year data for Standard A Enhanced Carrier Route Mail are shown below in column 1, and corresponding billing determinants data from LR-H-145 are shown in column 2.

- a. Please provide the source of your Base Year data for Standard A ECR mail and reconcile all differences between your data and the billing determinants.
- b. Where significant differences exist, which data are more reliable?

	(1)	(2)	(3)
	USPS-T-6 Page A-30 Table 4	LR-H-145 Billing Deter- minants	Col 2 as Percent of Col 1
STANDARD A MAIL			
Enhanced Carrier Route			
Automated	1,208.395	336.502	27.9%
Basic letters	7,464.164	9,663.822	129.5
Basic nonletters	9,367.546	8,462.895	90.3
High-density letters	245.893	92.730	37.7
High-density nonletters	992.760	753.194	75.9
Saturation letters	2,616.827	2,432.699	93.0
Saturation nonletters	<u>8,103.621</u>	<u>7,775.397</u>	<u>95.9</u>
Total (col 2 EXcludes automated letters)	29,999.206	29,180.737	97.3%
Total (col 2 INcludes automated letters)	29,999.206	29,517.239	98.4%