

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

RECEIVED

POSTAL RATE AND FEE CHANGES, 1997)

AUG 21 4 52 PM '97
Docket No. R97-1

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

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO POSTAL SERVICE WITNESS SHARON DANIEL (VP-CW/USPS-T29-1-2)
(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 Wolf

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-T-29-1.

Please refer to USPS-29D, p. 1, columns 4 and 5.

- a. Please provide a complete and exact citation for the source of the data in column 4.
- b. Please confirm that column 5 shows Test Year Total Cost Before Rates. If you do not confirm, please explain what the data in column 5 represent.
- c. Please provide Test Year Volume and Total Cost After Rates for each of the rows shown in USPS-29D.

VP-CW/USPS-T29-2.

Please refer to USPS-29C, p. 3, including footnote 2, which states that "ECR Mail Processing costs reflect current level of dropshipping."

- a. Please confirm that the unit costs shown in this exhibit are for Test Year. If you do not confirm, please explain what they represent.
- b. For the Test Year, what are the unit mail processing costs for ECR letters and nonletters that are:
 - (i) dropshipped to DDUs (*i.e.*, 100 percent dropshipped to DDUs);
 - (ii) dropshipped to DSCFs (*i.e.*, 100 percent dropshipped to DSCFs);
 - (iii) dropshipped to DBMCs (*i.e.*, 100 percent dropshipped to DBMCs); and
 - (iv) Not dropshipped to any destinating facility.
- c. Please explain what "other costs" include (as opposed to what they exclude), including whether such other costs include the cost of Postal-Owned Vehicles attributed to Standard A mail (*see* LR-H-111, Appendix B, Table 6).