

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

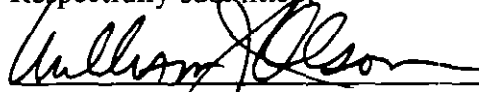
POSTAL RATE AND FEE CHANGES, 1997 )

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Docket No. R97-1

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 PETER HUME (VP-CW/USPS-T18-1-2)  
(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



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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-T18-1.**

Please refer to USPS-18B, p. 4, Table B-4. Please explain what the unit cost data for Enhanced Carrier Route shown on rows 7-12, represent. For example:

- a. Are the data for Base Year or Test Year?
- b. Are the data direct costs for cost segments 6, 7 and 10 only, or do they also include piggyback costs?
- c. If piggyback costs are included, what are the direct costs for each rate category exclusive of piggyback costs?

**VP-CW/USPS-T18-2.**

Please refer to USPS-18B, p. 5, Table B-5, rows 7-12, Enhanced Carrier Route.

- a. What does the total density in column ad represent?
- b. For Test Year 1998, what column represents your best estimate of the Postal Service's unit delivery costs on an After Rates basis?
- c. Please refer to USPS-29C pp. 2-3 and explain why the Enhanced Carrier Route Unit Delivery costs (referenced to USPS-T-18, but with no specific reference to page, table, or column) appear to be those shown in column (ab) of your Table B-5, and not those in column (ae) labeled as "actual" unit costs.
- d. Within USPS-T-18, what is the exact source of the unit delivery cost for Auto Basic shown in USPS-29C, p. 2?