

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

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

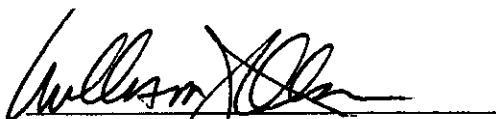
POSTAL RATE AND FEE CHANGES, 2001 )

VAL-PAK DIRECT MARKETING SYSTEMS, INC.  
AND VAL-PAK DEALERS' ASSOCIATION, INC.  
SIXTH INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS LARAIN B. HOPE (VP/USPS-T31-36-38)

(November 8, 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

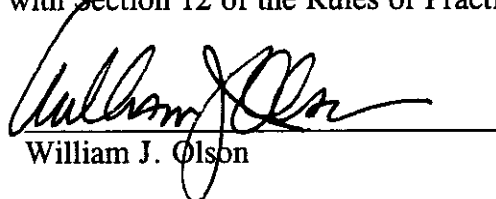
(703) 356-5070

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.



William J. Olson

November 8, 2001

**VP/USPS-T31-36.**

Please refer to your testimony, page 13, Table #3.

- a. The source note under Table #3 refers to “WP1, page Y for Revenue.” Please provide the precise cell references on page Y of WP1 where both the Before Rates and After Rates unit revenue figures shown in your Table #3 can be found.
- b. If the unit revenue figures shown in your Table #3 are not contained on page Y of WP1, please provide all data necessary to replicate the unit revenue figures shown in your Table #3, and cite the source for each datum. Specifically, for the numerator and denominator of the unit revenue figures in your Table #3, please provide:
  - (i) Before rates total revenues for piece-rated and pound-rated pieces above and below the 3.0 ounce dividing line.
  - (ii) Before rates volumes for piece-rated and pound-rated pieces above and below the 3.0 ounce dividing line.
  - (iii) Before rates total revenues for piece-rated and pound-rated pieces above and below the 3.5 ounce dividing line.
  - (iv) Before rates volumes for piece-rated and pound-rated pieces above and below the 3.5 ounce dividing line.
  - (v) After rates total revenues for piece-rated and pound-rated pieces above and below the 3.0 ounce dividing line.

- (vi) After rates volumes for piece-rated and pound-rated pieces above and below the 3.0 ounce dividing line.
- (vii) After rates total revenues for piece-rated and pound-rated pieces above and below the 3.5 ounce dividing line.
- (viii) After rates volumes for piece-rated and pound-rated pieces above and below the 3.5 ounce dividing line.

**VP/USPS-T31-37.**

Please refer to your testimony, page 13, Table #3.

- a. The source note under Table #3 refers to “USPS-LR-J-59 for Estimated Test Year Costs.” Library reference USPS-LR-J-59 contains six files, and each file contains a number of spreadsheets. Please provide the precise files, spreadsheets and cell references in USPS-LR-J-59 where both the piece-rated and pound-rated unit cost figures shown in your Table #3 can be found.
- b. If the unit cost figures shown in your Table #3 are not explicitly contained in any of the files and spreadsheets in USPS-LR-J-59, please provide all data necessary to replicate the unit cost figures shown in your Table #3, and cite the source for each datum. Specifically, for the numerator and denominator of the unit cost figures in your Table #3, please provide:
  - (i) Total costs for piece-rated and pound-rated pieces above and below the 3.0 ounce dividing line.

- (ii) Volumes used to compute unit costs for piece-rated and pound-rated pieces above and below the 3.0 ounce dividing line.
- (iii) Total costs for piece-rated and pound-rated pieces above and below the 3.5 ounce dividing line.
- (iv) Volumes used to compute unit costs for piece-rated and pound-rated pieces above and below the 3.5 ounce dividing line.

**VP/USPS-T31-38.**

- a. With reference to the total cost data requested in VP/USPS-T31-39, please provide a breakdown among (i) mail processing, (ii) delivery, (iii) transportation, and (iv) other, for each of the four categories discussed: *i.e.*, for piece-rate and pound-rated pieces above and below 3.0 ounces and 3.5 ounces. If the requested breakdown is not available for Test Year costs, please provide it for Base Year 2000.
- b. Please describe how transportation costs are distributed to piece-rated and pound-rated pieces by ounce increment.
- c. Please describe how delivery costs are distributed to piece-rated and pound-rated pieces by ounce increment.