

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

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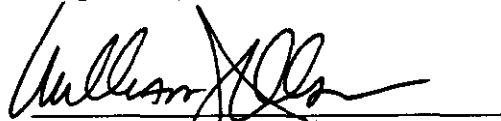
POSTAL RATE AND FEE CHANGES, 2001 )

POSTAL RATE COMMISSION  
Docket No. R2001-1

VAL-PAK DIRECT MARKETING SYSTEMS, INC. AND  
VAL-PAK DEALERS' ASSOCIATION, INC.  
FIRST INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS GEORGE S. TOLLEY (VP/USPS-T7-1-3)  
(November 16, 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.

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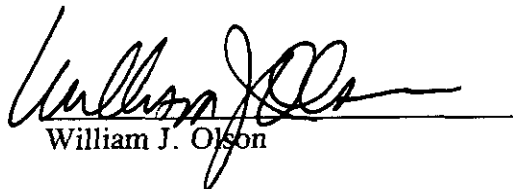
Counsel for:

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 16, 2001

**VP/USPS-T7-1.**

Assume that witness Moeller (USPS-T-28) had reduced the revenue requirement for Standard ECR by \$100 million below the \$5,555.656 million After Rates revenue requirement shown in Exhibit USPS-28B.

- a. What would have been the After Rates volume forecast for Standard ECR?
- b. If you provided any breakdowns of projected Standard ECR volumes below the subclass level (*e.g.*, for presort categories), please provide a similar breakdown here.

**VP/USPS-T7-2.**

Assume that witness Moeller (USPS-T-28) had reduced the revenue requirement for Standard ECR by \$125 million below the \$5,555.656 million After Rates revenue requirement shown in Exhibit USPS-28B.

- a. What would have been the After Rates volume forecast for Standard ECR?
- b. If you provided any breakdowns of projected Standard ECR volumes below the subclass level (*e.g.*, for presort categories), please provide a similar breakdown here.

**VP/USPS-T7-3.**

Assume that witness Moeller (USPS-T-28) had reduced the revenue requirement for Standard ECR by \$150 million below the \$5,555.656 million After Rates revenue requirement shown in Exhibit USPS-28B.

- a. What would have been the After Rates volume forecast for Standard ECR?
- b. If you provided any breakdowns of projected Standard ECR volumes below the subclass level (*e.g.*, for presort categories), please provide a similar breakdown here.