

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

RECEIVED

POSTAL RATE AND FEE CHANGES, 1997 )

Doc. No. 97-1046 PM '97

VAL-PAK DIRECT MARKETING SYSTEMS, INC.,  
VAL-PAK DEALERS' ASSOCIATION, INC., AND  
CAROL WRIGHT PROMOTIONS, INC  
FIRST FOLLOW-UP INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS  
TO POSTAL SERVICE WITNESS SHARON DANIEL (VP-CW/USPS-T29-3-4)  
(September 9, 1997)

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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

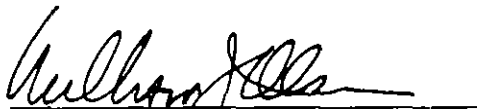
McLean, Virginia 22102-3823

(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

September 9, 1997

**VP-CW/USPS-T29-3.**

Please refer to your response to VP-CW/USPS-T29-1(c), where you discussed Test Year **After Rates** volume variable unit costs, corresponding to column 6 of USPS-29D, page 1.

USPS-29D, page 1, **columns 4 and 5** show Test Year Volume and Total Cost **Before Rates**. Please provide **After Rates** data corresponding to each entry in **columns 4 and 5**, as originally requested in VP-CW/USPS-T29-1(c).

**VP-CW/USPS-T29-4.**

Please refer to your response to VP-CW/USPS-T29-2(b), where you provide estimates of Test Year mail processing unit costs for ECR. Your response states that "this is not a bottom-up cost analysis."

- a. Please explain what you meant by this disclaimer. If it is not a bottom-up cost analysis, what kind of cost analysis is it?
- b. Please explain fully what each unit cost provided in your response includes and represents.