

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

POSTAL RATE AND FEE CHANGES, 2005)

Docket No. R2005-1

VALPAK DIRECT MARKETING SYSTEMS, INC. AND
VALPAK DEALERS' ASSOCIATION, INC.
SECOND INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS MAURA ROBINSON (VP/USPS-T27-10)
(May 19, 2005)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Valpak Direct Marketing Systems, Inc. and Valpak 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,

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Valpak Dealers' Association, Inc.

May 19, 2005

VP/USPS-T27-10.

- a. Please refer to your testimony (USPS-T-27) at Exhibit USPS-27D, which indicates that the percent change in the proposed rates over current rates for Standard Mail Enhanced Carrier Route (“ECR”) is **5.5 percent**. Please explain the reason(s) for the difference between this amount and the amount provided in the testimony of Postal Service witness Taufique (USPS-T-28) which indicates that the Postal Service is proposing rates that have an average increase of **5.6 percent** for Standard Mail ECR (USPS-T-28, p. 11, ll. 17-18).
- b. Please refer to your testimony (USPS-T-27) at Exhibit USPS-27D, which indicates that the percent change in the proposed rates over current rates for Standard Mail Nonprofit ECR is **6.0 percent**. Please explain the reason(s) for the difference between this amount and the amount provided in the testimony of Postal Service witness Taufique (USPS-T-28) which indicates that the Postal Service is proposing rates that have an average increase of **5.9 percent** for Standard Mail Nonprofit ECR (USPS-T-28, p. 11, l. 18).