

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.
THIRD INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS ROBERT L. SHAW, JR. (VP/USPS-T2-22-23)
(June 1, 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,

William J. Olson
John S. Miles
Jeremiah L. Morgan
WILLIAM J. OLSON, P.C.
8180 Greensboro Drive, Suite 1070
McLean, Virginia 22102-3860
(703) 356-5070

Counsel for:
Valpak Direct Marketing Systems, Inc. and
Valpak Dealers' Association, Inc.

June 1, 2005

VP/USPS-T2-22.

Please assume that a group of Standard ECR Saturation letters is being delivery point sequenced, that one or more of these letters causes a machine jam, and that, during the time any such jammed piece is being removed from the machine, an In-Office Cost System (“IOCS”) tally is taken. Would that tally, and the costs associated with that tally, be charged to Saturation letters? If not, please explain.

VP/USPS-T2-23.

How many IOCS tallies taken in the delivery point sequence MODS pool indicate a machine jam at the time the tally is taken?