

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.  
REVISED INTERROGATORY AND REQUEST FOR  
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS JOHN KELLEY (VP/USPS-T16-38) (ERRATA)  
(June 7, 2005)

Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc. hereby submit a revised interrogatory to witness Kelley that corrects certain typographical errors in parts e and f of VP/USPS-T16-38, which was filed originally on June 6, 2005. A replacement page 9 is attached.

Respectfully submitted,

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June 7, 2005

all processing options provided by **Basic automation letters** plus some others (e.g., taking Saturation letters to the route as sequenced mail), would it be reasonable to expect the unit delivery costs of Saturation letters to be lower than the unit delivery costs of **Basis automation letters**? Please explain.

- d. If all **ECR Saturation letter** mail were to convert to **ECR Basic automation**, do you believe that the Postal Service would save approximately 1.0 cents per piece in delivery costs? Please explain any answer other than an unqualified affirmative.
- e. Please refer to Attachment to VP/USPS-T16-38, page 1, column 3, rows 1 and 4, and explain why the total city carrier unit cost for **Saturation letters** (after the DAL adjustment) is \$0.0169 greater than the total city carrier unit cost for **Basic automation letters**.
- f. Please refer to Attachment to VP/USPS-T16-38, page 1, column 2, rows 4 and 7, and explain why the city carrier street cost for **Saturation letters** (after the DAL adjustment) is \$0.0048 greater than the city carrier street cost for **Saturation flats**.