

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.
FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS KAREN MEEHAN (VP/USPS-T9-1)
(June 7, 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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June 7, 2005

VP/USPS-T9-1.

Please refer to your testimony beginning at page 6, line 9, through page 11, line 2, with special attention to page 8, lines 9-14, where you discuss city carrier costs.

- a. Does the adjustment for detached address labels (“DALs”) contained in the testimony of witness Kelley (USPS-T-16, p. 6) and USPS-LR-K-67 qualify as a new study or change in methodology? If so, please indicate why this part of your testimony makes no reference to the adjustment for DALs.
- b. Did your development of Base Year costs include the cost adjustment for DALs? If so, please indicate where that can be found, in both your testimony and your spreadsheets.