

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

POSTAL RATE AND FEE CHANGES, 2005)

Docket No. R2005-1

RESPONSES OF VALPAK DIRECT MARKETING SYSTEMS, INC. AND
VALPAK DEALERS' ASSOCIATION, INC. TO INTERROGATORIES OF ADVO, INC.
REDIRECTED FROM WITNESS JOHN HALDI (ADVO/VP-T2-9-11(a))
(August 18, 2005)

Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc. hereby submit responses to the following interrogatories of Advo, Inc. that were redirected from witness Haldi: ADVO/VP-T2-9-11(a), filed on July 29, 2005. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

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**Response of Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc.
to Advo, Inc. Interrogatory, Redirected from Witness Haldi**

ADVO/VP-T2-9.

At page 5 of your testimony, you state that Valpak Direct Marketing Systems, Inc. is a wholly owned-subsiary of Cox Enterprises, Inc. of Atlanta, Georgia. Please confirm that Valpak is a wholly-owned subsidiary of Cox Target Media, Inc., which is a wholly-owned subsidiary of Cox Newspapers, Inc.

RESPONSE:

Not confirmed. Valpak Direct Marketing Systems, Inc. is a subsidiary of VP Holdings, Inc., which in turn is a wholly-owned subsidiary of Cox Target Media, Inc. Cox Target Media, Inc. is a wholly-owned subsidiary of Cox Enterprises, Inc.

**Response of Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc.
to Advo, Inc. Interrogatory, Redirected from Witness Haldi**

ADVO/VP-T2-10.

Please confirm that Cox Newspapers, Inc. is the publisher of 17 daily newspapers, including the Atlanta Constitution Journal.

RESPONSE:

Confirmed, but the name of the Atlanta newspaper is The Atlanta Journal-Constitution.

**Response of Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc.
to Advo, Inc. Interrogatory, Redirected from Witness Haldi**

ADVO/VP-T2-11(a).

At page 8 of your testimony, you state that 99 percent of ValPak's mail is entered at the destinating SCF, with the remainder "entered at BMCs, or locally, in either St. Petersburg, Florida or Elm City, North Carolina" where Val-Pak's production facilities are located.

(a) Please confirm that this means that well less than 1 percent of Val-Pak's coupon enveloped mail is entered at destination delivery units. If you cannot confirm, please provide the correct percentage of Val-Pak's DDU-entered mail.

RESPONSE:

- a. Confirmed.