

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

POSTAL RATE AND FEE CHANGES, 2005 )

Docket No. R2005-1

REVISED RESPONSE OF VALPAK DIRECT MARKETING SYSTEMS, INC. AND  
VALPAK DEALERS' ASSOCIATION, INC.

WITNESS JOHN HALDI TO INTERROGATORY OF  
ADVO (ADVO/VP-T2-18) (Errata)  
(August 24, 2005)

Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc.

("Valpak") hereby submit a revised response of witness John Haldi to the following  
interrogatory of Advo: ADVO/VP-T2-18, filed on August 23, 2005. The interrogatory is  
stated verbatim and is followed by the response.

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.

**Response of Valpak Witness Haldi  
to Interrogatory of Advo, Inc.**

**Revised 8/24/05**

**ADVO/VP-T2-18.**

The 2004 billing determinants for nonprofit ECR saturation letter mail ("Standard Mail BD2004.xls," page G 4-2) show that (1) 45 percent of nonprofit letters were dropped [sic] shipped to the destination delivery office; (2) such nonprofit letters comprise one-third of all saturation DDU letters; and (3) commercial plus nonprofit DDU letters constitute 26.1 percent of total saturation letters. Please explain your understanding of the nature of the nonprofit saturation letter volume that is entered at destination delivery units.

**RESPONSE:**

I have no specific knowledge concerning which nonprofit organizations send Nonprofit ECR saturation letter mail, or for what purpose, nor which of those nonprofit organizations opt to use DDU entry for their Nonprofit ECR saturation mail. It would be my expectation, however, that most Nonprofit saturation letters consist generally of solicitations. Further, such solicitations that use the saturation rate presumably would be from nonprofit organizations with broad-based local appeal; *e.g.*, hospitals soliciting donations from within their catchment area. The fact that much of such mail is generated locally would help explain why 37 percent is entered at DDUs.