

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

POSTAL RATE AND FEE CHANGES, 2005)

Docket No. R2005-1

MOTION OF VALPAK DIRECT MARKETING SYSTEMS, INC. AND
VALPAK DEALERS' ASSOCIATION, INC.
TO ADMIT INTO EVIDENCE THE RESPONSES OF ADVO, INC.
TO INTERROGATORIES VP/ADVO-1-6
(August 31, 2005)

Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc. ("Valpak") hereby move for admission into evidence and incorporation into the record the following interrogatory responses of Advo, Inc. ("Advo"), which were filed on August 22, 2005.

VP/ADVO-1-6 answered by Advo (August 22, 2005)

Two copies of the above documents are submitted herewith to the Secretary of the Commission.

Valpak filed interrogatories VP/ADVO-1-6 to Advo on July 29, 2005, and, by agreement, Advo filed its responses on August 22, 2005, along with a motion for acceptance of late-filed responses. This motion was granted by Presiding Officer's Ruling No. R2005-1/74 on August 23, 2005.

Valpak believes that Advo's responses to interrogatories VP/ADVO-1-6 provide important information relevant to the issues in this docket and should be part of the evidentiary record. Advo's responses were incorporated in the revisions to the direct testimony of Dr. John Haldi (VP-T-2) filed on August 23, 2005, which was subject to cross-examination at the

August 24, 2005 hearing. The Chairman expressed his and the Commission's appreciation at the Commission hearing on August 24, 2005 to Advo for providing these responses to Valpak's interrogatories, and stated "as a result the Commission will be able to develop a far more reliable cost estimate" than otherwise would have been possible. (Tr. 9/5463, ll. 23-25.)

Respectfully submitted,

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