

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

POSTAL RATE AND FEE CHANGES, 2006 )

Docket No. R2006-1

VALPAK DIRECT MARKETING SYSTEMS, INC. AND  
VALPAK DEALERS' ASSOCIATION, INC.  
SECOND INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS JAMES W. PAGE (VP/USPS-T23-2)  
(May 23, 2006)

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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Valpak Dealers' Association, Inc.

**VP/USPS-T23-2.**

Please refer to the final adjustments you show for the ECR subclass in USPS-LR-L-59, workbook Final Adjustments2008-USPS.xls, sheet 'Total' at cells E104 through G104, and to the statement of witness Kiefer, USPS-T-36, page 32, footnote 15, that: "For revenue calculation purposes, I have assumed that 50% of current DAL mail will be addressed on the piece in the future."

- a. Did you or any other Postal Service witness make an adjustment to ECR costs for a shift in the Test Year to addressed pieces instead of DAL pieces?
- b. If you, or some other witness, made such an adjustment, please provide the details of the adjustment, including: (i) a specific reference to where the adjustment is made; (ii) the cost (and its source) used to make the adjustment; and (iii) the volume used to make the adjustment.
- c. If such an adjustment was not made, please explain why the adjustment was not made, including the rationale for not making it.
- d. If such an adjustment was not made, but is needed, in the opinion of you or the Postal Service, please indicate how and where the adjustment should be made, including cost and volume information.