

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.
THIRD INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS JAMES W. PAGE (VP/USPS-T23-3)
(June 8, 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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VP/USPS-T23-3.

Please refer to your response to VP/USPS-T23-1(a), indicating that \$164,842,000 was removed from ECR costs due to the assumption that all Basic ECR Automation letters move to Regular Standard. This figure is shown in cell G104 on tab 'Total' of your workbook Final Adjustments2008-USPS.xls in USPS-LR-L-59.

- a. Please confirm that the volume associated with this shift is 2,278,026,000 pieces, shown, for example, in cell M40 of tab 'MP' of the workbook cited above. If you do not confirm, please provide the appropriate figure.
- b. Please confirm that this adjustment amounts to 7.236 cents per piece and includes all cost segments, as detailed in column G of tab 'Total' of the workbook cited above. If you do not confirm, please provide an appropriate figure for the total unit cost.
- c. Please confirm that 2.544 cents of this adjustment is mail processing costs, shown on line 12 of the above-cited column G. If you do not confirm, please provide an appropriate figure. Regardless of whether you confirm, please compare your figure with the mail processing cost of 4.748 cents shown in cell D9 of tab 'Table 1' of workbook LR-L-84.xls in USPS-LR-L-84, and reconcile any differences.
- d. Please confirm that 4.188 cents of this adjustment is carrier costs, city and rural. If you do not confirm, please provide an appropriate figure. Regardless of whether you confirm, please explain the consistency of the figure you use with the mail processing cost of 2.887 cents shown in cell C60 of tab '1.Table 1' in

workbook LR-K-67_2nd.revised.xls in USPS-LR-K-107, revised June 9, 2005,

Docket No. R2005-1.