

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.
REVISED INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS ELIANE VAN-TY-SMITH (VP/USPS-T11-2-3 and 5) (ERRATA)
(June 21, 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 revised interrogatories VP/USPS-T11-2, 3, and 5. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

Revised interrogatory VP/USPS-T11-2 makes a minor restatement of part c. Revised interrogatory VP/USPS-T11-3 clarifies some text in part a. Revised interrogatory VP/USPS-T11-5 restates the question.

Respectfully submitted,

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VP/USPS-T11-2.

- a. When a carrier who is casing DALs in the office is tallied by the IOCS, is the carrier recorded as casing a flat, or a DAL? Please explain your answer.
- b. If your answer to preceding part a is to the effect that the tally is recorded as a flat, does the tally contain any information that could be used to indicate that the carrier in fact was casing a DAL instead of the host flat piece? Please explain your answer.
- c. When a DAL is the subject piece of an IOCS tally, does the tally contain any information that the host flat piece, whose basic characteristics such as weight and shape are recorded, is unaddressed? Please explain your answer.

VP/USPS-T11-3.

Please refer to your responses to preceding interrogatories, VP/USPS-T11-1 and 2.

- a. If IOCS tallies of city carriers do not distinguish between collating flats and casing flats, and also do not distinguish between casing flats and casing DALs, then:
 - (i) With respect to carrier activities associated with saturation flats, how accurate is a profile that is developed from a compilation of IOCS tallies?
 - (ii) Witness Kelley develops estimates of the volumes of DALs and flats that, respectively, are cased and collated. How accurate are such

estimates when they are based on or derived from IOCS tallies that do not explicitly identify or distinguish between such activities?

- b. When one cannot tell from IOCS tallies whether carriers were (i) collating flats in lieu of casing flats, or (ii) casing DALs in lieu of casing flats, please describe how one develops a meaningful estimate of the coefficient of variation, or any other pertinent measure of dispersion and statistical uncertainty for the volume of saturation flats that carriers actually case.

VP/USPS-T11-5.

Does the Postal Service have any plans to change the IOCS so as to distinguish or otherwise identify DALs explicitly when they are the subject of an IOCS tally that is taken on letter-shaped pieces being DPS'd?

- a. If so, please indicate when the IOCS will begin to record such information.
- b. If not, please refer to USPS-T-42, page 12, lines 27-28 (which says that DALs are often transported back to the plant for DPS processing) and explain how the IOCS can be used to estimate either the cost or volume of DALs that are DPS'd (or the proportion of DPS'd letter shaped pieces that are DALs).