

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 MARC D. MCCRERY (VP/USPS-T42-26-27)
(June 28, 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-T42-26.

Please refer to your testimony at page 13, lines 18-21, where you state “there are only limited opportunities to increase efficiencies within letter mail processing operations through the application of **proven** technologies.” (Emphasis added.) Is the Postal Service considering or experimenting with any technologies that might not be now considered “proven” but which could result in more efficient letter mail processing? If so, please describe briefly any technological improvements of which you are aware that might evolve and be deployed after the Test Year in this docket.

VP/USPS-T42-27.

Please refer to your testimony at page 36, lines 11-13, where you state that “a few very large schemes (*e.g.*, the initial outgoing and incoming schemes, *i.e.*, the ‘primaries’) may be run on multiple sorters due to time constraints.”

- a. Please define, with more specificity, the term “large schemes” as you use it here.
- b. What is the **maximum** number of separations in the “large scheme” you mention?
- c. To qualify as a “large scheme,” what is the **minimum** number of separations that would be needed?
- d. Could large volume for a “medium” size sort scheme also result in mail for the same scheme being run on multiple sorters? Please explain.

- e. Your response to VP/USPS-T42-3(a) identified 97 facilities as having 6-10 DBCS machines. What percentage of these facilities would be likely to run the same initial outgoing or incoming schemes on multiple machines?
- f. Your response to VP/USPS-T42-3(a) identified 160 facilities as having greater than 10 DBCS machines. What percentage of these facilities would be likely to run the same initial outgoing or incoming schemes on multiple machines?