

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.
FOURTH INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS JOYCE K. COOMBS (VP/USPS-T44-23-33)
(July 10, 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-T44-23.

On rural routes, when mailers submit a saturation mailing using a simplified address:

- a. Is the mail piece required to have a barcode?
- b. If so, is it a 5-digit, 9-digit, or 11-digit barcode?

VP/USPS-T44-24.

Can saturation letters for delivery on a rural route with a simplified address be DPS'd, or must they always be sorted manually?

VP/USPS-T44-25.

Will the Postal Service be able to sort on the FSS machineable saturation flats for delivery on a rural route with a simplified address?

VP/USPS-T44-26.

Are saturation mailings permitted to use a simplified address for all rural routes, or is use of simplified addresses restricted in any way?

VP/USPS-T44-27.

For saturation mailings sent to rural routes in FY 2005, what proportion used simplified addresses?

VP/USPS-T44-28.

Please confirm that non-federal government agency mailers may not use simplified address on any city routes.

VP/USPS-T44-29.

Please refer to the response of witness Kelley (USPS-T-30) to NAA/USPS-T30-5(a) and explain how the “Deceptive Mail Prevention and Enforcement Act, Public Law 106-168, amending 39 U.S.C. § 3001,” restricts the use of simplified addresses.

VP/USPS-T44-30.

Please refer to your response to VP/USPS-T44-17(a), and please discuss the nature of the “operational restrictions” referred to in your response, and supply two or three examples of the operational restrictions to which you refer.

VP/USPS-T44-31.

Please refer to your response to VP/USPS-T44-17(b), and assume that the two sets of saturation flats which (i) had to be delivered on the same day, and (ii) were taken directly to the street, consisted of unaddressed covers and DALs. Please discuss how the carrier would most likely handle the DALs — *i.e.*, case both sets of DALs, take both sets of DALs to the street as extra bundles, or case one set and take the other set to the street as an extra bundle.

VP/USPS-T44-32.

Please refer to your response to VP/USPS-T44-18(b), and explain in more detail what you mean by your reference to “the logistical constraints of the vehicle.”

VP/USPS-T44-33.

Please refer to your response to VP/USPS-T14-22.

- a. Assuming that a mailing of saturation letters comports fully with the DMM size restrictions on letters, what size or shape of letter envelope would be incompatible with a bundle of DPS mail?
- b. Would a number 10 envelope be incompatible with a bundle of DPS mail?
- c. Are you aware of saturation letter mailings that are incompatible with a bundle of DPS mail?
- d. Based on your experience, what percent of saturation letter mailings would be incompatible with a bundle of DPS mail?
- e. When city carriers elect to put saturation letters in their satchel, do they encounter any difficulty working with a bundle of saturation letters in their satchel? If so, please describe the nature of the problem.