

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.  
FIFTH INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS JOYCE K. COOMBS (VP/USPS-T44-34-35)  
(July 14, 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,

---

William J. Olson  
John S. Miles  
Jeremiah L. Morgan  
WILLIAM J. OLSON, P.C.  
8180 Greensboro Drive, Suite 1070  
McLean, Virginia 22102-3860  
(703) 356-5070

Counsel for:  
Valpak Direct Marketing Systems, Inc. and  
Valpak Dealers' Association, Inc.

**VP/USPS-T44-34.**

An article “Mail Goes Where the Money Is,” by Marshall Kolin and Edward J. Smith, in *Emerging Competition in Postal and Delivery Services* (Kulwer Academic Publishers, 1999), pages 159-179, indicates that higher volumes of mail, on a per capita basis, are delivered in areas where residents have higher-than-average incomes. The FY 2005 Billing Determinants (USPS-LR-L-77) indicate that the total volume of saturation mail was 13.8 billion pieces (both letters and flats).

- a. Does the Postal Service maintain any records that indicate the concentration of mail by ZIP code? If so, please provide.
- b. Does the Postal Service maintain any records that indicate the concentration of ECR saturation mail by ZIP code area? If so, please provide.
- c. On the basis of your experience, do some ZIP code areas receive saturation mail rarely, if ever? If so, please indicate some identifying characteristics of such areas.
- d. Your testimony at page 13, lines 15-19, notes that:

There are obviously situations that currently exist where flats are not taken directly to the street such as the presence of two sets of flats on the same delivery day.

On the basis of your experience, do some ZIP code areas receive a disproportionately large number of ECR saturation mailings, including two such mailings on the same day? If so, please describe some identifying characteristics of such areas.

**VP/USPS-T44-35.**

Please refer to your response to VP/USPS-T30-8(a) (redirected from witness Kelley, USPS-T-30).

- a. If it is generally easier to case flat-shaped pieces that are enveloped or bound in some manner than it is to case a piece that is considered a wrap or host piece, as you assert, then would it be reasonable to infer that a wrap or host piece offers the Postal Service less flexibility with regard to handling methods than do enveloped or bound pieces? Please explain your answer.
- b. Comparing enveloped flats with wraps of the same weight, are wraps just slightly more difficult to case, or are wraps considerably more difficult to case? Please explain your answer.
- c. Comparing stapled (bound) catalogs with wraps of the same weight, are catalogs just slightly more difficult to case than wraps, or are wraps considerably more difficult to case? Please explain your answer.