

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006 )

Docket No. R2006-1

MOTION OF VALPAK DIRECT MARKETING SYSTEMS, INC.  
AND VALPAK DEALERS' ASSOCIATION, INC.  
TO DESIGNATE EVIDENCE FROM OTHER COMMISSION DOCKETS  
(August 9, 2006)

Pursuant to sections 31(e) of the Postal Rate Commission rules of practice, Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc. ("Valpak") hereby move the following evidence from other Commission proceedings into the record of the current proceeding:

**Docket No. N2006-1:**

Responses of Postal Service witness Shah to VP/USPS-T1-6, 14(d), and 15(a-b) (Tr. 2/131-32, 143, 144).

**Docket No. R2005-1:**

ADVO cross examination Exhibit ADVO-XE-11 (Tr. 9/5678) which was admitted into evidence (Tr. 9/5667);

ADVO library reference ADVO-LR-1, worksheets '1.VP Table A-8 Modified' and '2.ADVO XE-11' of workbook ADVO-LR-1.xls which was admitted into evidence (Tr. 10/5770); and

Valpak oral cross examination of ADVO witness Crowder, September 14, 2005 (Tr. 10/5779, 1. 24 - 5782, 1. 24)

The purpose of these designation is to improve the record in this docket by including recent evidence from other dockets upon which Valpak intends to rely in its direct case.

The evidence from Docket No. N2006-1 involves Postal Service definitions of various service-related terms which relate to the coverages proposed by USPS witness O'Hara (USPS-

T-31). These responses were made by USPS witness Shah to Valpak interrogatories in Docket No. N2006-1 on April 25, 2006, and therefore they are approximately as current as the Postal Service filing initiating this rate case on May 3, 2006. Docket No. N2006-1 is still pending before the Commission.

The evidence from Docket No. R2005-1 involves an estimate of Detached Address Labels (DALs) based on the record developed in Docket No. R2005-1. As Docket No. R2005-1 was the last omnibus rate case, this information is also timely, dealing with data from FY 2004. Having this information in the record of this case will avoid the need to replicate in this docket the process by which this DAL estimate was made in the last omnibus rate case.

Respectfully submitted,

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