

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE TO
VALPAK DIRECT MARKETING ASSOCIATION, INC. AND VALPAK DEALERS'
ASSOCIATION, INC. WITNESS MITCHELL
(USPS/VP-T1-34-36)

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service directs the above-referenced interrogatories to Valpak Direct Marketing Association, Inc. and Valpak Dealer's Association, Inc. witness Mitchell.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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USPS/VP-T1-34 Please refer to your response to USPS/VP-T1-2, part (d), where you say “[w]hether the Postal Service would assume the migrating pieces have the average cost of their categories, as it has done in some NSAs, is open to question, but the costs available for ECR flats are much lower than the costs for 5-digit automation flats.”

Do you believe that the cost per piece for the Postal Service to handle ECR flats in 10-piece bundles is likely to be higher on average than the cost per piece of handling the same pieces in 20-piece, or larger, bundles, all other things being equal? If your answer is anything other than an unqualified yes, please explain fully.

USPS/VP-T1-35 Please refer to your response to USPS/VP-T1-2, part (e). In your view, is it appropriate ratemaking for the Postal Service and the Commission to develop rates designed to have, among other goals, the goal of keeping mail with similar cost characteristics together within a particular mail category? If your answer is other than an unqualified yes, please explain fully why taking this factor into consideration when ratemaking is not appropriate.

USPS/VP-T1-36 Please refer to your response to USPS/VP-T1-8. Please confirm that, when you say that “trucks loaded with printed matter such as Standard mail generally weigh out before they cube out” you are basing your assertion on your general knowledge and not on any study of how the Postal Service, in particular, containerizes, moves, loads and trucks mail, that may include Standard Mail, between its plants.