



**ADVO/VP-T1-15.**

- (a) Do you have any knowledge or understanding of any differences in the typical frequency of mailing (e.g., weekly, monthly, less-than-monthly) between ECR saturation letter mailings and ECR saturation flat mailings? If so, please state your understanding and provide sources.
- (b) Are you aware of any ECR saturation letter mail programs that are mailed in a market on a regular weekly basis? If so, please identify the mailers and the markets, and quantify the volumes of such weekly-frequency saturation letter mail.
- (c) Are you aware of any ECR saturation letter mail programs that are mailed in a market on a more-frequently-than-monthly basis, i.e., more than 12 times per year? If so,
  - (i) please identify the mailers and the markets, and quantify the volumes of such saturation letter mail;
  - (ii) please state whether distribution more frequently than monthly is either commonplace, the exception, or nonexistent for saturation letter mail.
- (d) To the extent you believe there are differences in the typical frequency of mailing between ECR saturation letter mailings and saturation flat mailings, please describe the factors that you believe may account for the differences.

**ADVO/VP-T1-16.** At page 84 of your testimony, you state that “limited portions of the mail matter in Regular and ECR can be carried by private competitors....”

- (a) Please confirm that ECR saturation letters could be sent privately if unaddressed.

- (b) Are any of Val-Pak's letter-size enveloped coupons distributed by private delivery, not mail? If so, please provide the following:
- (i) the total volume of such privately-delivered pieces in 2005 and an estimate for 2006;
  - (ii) the percentage of Val-Pak's total enveloped coupon volume that is delivered privately; and
  - (iii) identify the markets where private delivery is used, and for each market identify the private delivery company used.

**ADVO/VP-T1-17.** Do you agree that the great majority of multi-page preprinted advertising circulars currently can be distributed either as inserts in newspapers, or as inserts in shopper publications or shared mail programs (which can be delivered either privately or via mail), without any change to the format of the preprint. If you disagree, please explain your understanding of the format and characteristics of such circulars, and how they differ between newspapers and mail and private delivery.

**ADVO/VP-T1-18.** With respect to your statements that saturation letters and flats can be viewed as "separate products,"

- (a) Explain your understanding of why saturation shoppers and shared mail programs choose a flat-sized rather than letter-sized format for their mailing programs.
- (b) To what extent do you believe that their choice of format is dictated by competitive considerations (e.g., that reformatting their mailings to letter-size would impair their ability to compete for preprinted advertising circulars)?

**ADVO/VP-T1-19.** Currently, the rate for ECR basic letters is "linked" to the rates for the Standard A Regular subclass by being set higher than the rate for 5-digit automation letters. With this linkage to rates for the Regular subclass, if the rates for other

categories within the ECR subclass are then set on the basis of cost differences, how does this result differ conceptually from the circumstance where ECR mail were treated as rate categories of Standard A Regular rather than as a separate subclass?