

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

POSTAL RATE AND FEE CHANGES, 2006)

Docket No. R2006-1

RESPONSES OF VALPAK DIRECT MARKETING SYSTEMS, INC. AND
VALPAK DEALERS' ASSOCIATION, INC. TO INTERROGATORIES OF
ADVO, INC. (ADVO/VP-1-2)
(October 18, 2006)

Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc.

("Valpak") hereby submit responses to the following interrogatories of Advo, Inc.:

ADVO/VP-1-2, filed on October 4, 2006. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

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Valpak Dealers' Association, Inc.

**Response of Valpak to Interrogatory
of the Advo, Inc.**

ADVO-VP-1.

For the year 2005, please provide a breakout of the following volume information for Valpak's coupon envelope program (including both owned and franchisee operations):

- a. The volume of letter mail pieces and percentage of total volume that weighed 3.3 ounces or less and paid the ECR saturation letter rate.
- b. The volume of letter mail pieces and percentage of total volume that weighed between 3.3 and 3.5 ounces and paid the "heavyweight" saturation letter rate.
- c. The volume of letter mail pieces and percentage of total volume that weighed more than 3.5 ounces and paid the ECR saturation non-letter rate.
- d. If the percentages in a-c above do not total to 100 percent, please explain why (e.g., pieces under 3.3 ounces but flat-shaped; pieces that were not saturation density).

If information for 2005 is not available, please provide the information for the most recent 12-month period (specifying the period).

Response:

- a. 478,625,607 and 92.8%.
- b. 13,617,282 and 2.6%.
- c. 23,552,000 and 4.6%.
- d. Not applicable.

**Response of Valpak to Interrogatory
of the Advo, Inc.**

ADVO-VP-2.

For the year 2005, please provide a breakout of the following weight information for Valpak's coupon envelope program (including both owned and franchisee operations):

- a. The overall average weight per piece.
- b. The average weight per piece of letter mail pieces that weighed 3.3 ounces or less and paid the ECR saturation letter rate.
- c. The average weight per piece of mail pieces that weighed over 3.5 ounces and paid the ECR saturation non-letter rate.

If information for 2005 is not available, please provide the information for the most recent 12-month period (specifying the period).

Response:

- a. Note that as a complete response to this interrogatory, counsel for Advo has requested a clarification of the following statement: "The average weight of a VPDMS piece is about 2.5 ounces." VP-T-2, p. 6, line 1.

Clarification: This approximate average weight relates generally to all VPDMS pieces, not just its "coupon envelope program."

- b-c. This information is not available. (If it had been available, it would be considered confidential business information.) Counsel for Advo has advised that Advo withdraws these parts of this interrogatory.