

# DOCKET SECTION

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

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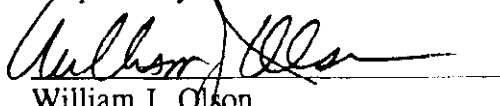
POSTAL RATE AND FEE CHANGES, 1997 )

Docket No. 3 R97-11 '98

VAL-PAK DIRECT MARKETING SYSTEMS, INC.,  
VAL-PAK DEALERS' ASSOCIATION, INC., AND  
CAROL WRIGHT PROMOTIONS, INC  
FIRST INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS  
TO ASSOCIATION OF ALTERNATE POSTAL SYSTEMS WITNESS  
KENNETH BRADSTREET (VP-CW/AAPS-T1-1-3)  
(January 28, 1998)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Val-Pak Direct Marketing Systems, Inc., Val-Pak Dealers' Association, Inc., and Carol Wright Promotions, Inc., d/b/a "Cox Direct," hereby submit the following interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Association of Alternate Postal Systems witness.

Respectfully submitted,



William J. Olson

John S. Miles

Alan Woll

John F. Callender, Jr.

William J. Olson, P.C.

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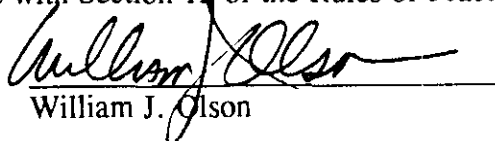
McLean, Virginia 22102-3823

(703) 356-5070

Counsel for Val-Pak Direct Marketing Systems, Inc.,  
Val-Pak Dealers' Association, Inc., and  
Carol Wright Promotions, Inc.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.



William J. Olson

January 28, 1998

**VP-CW/AAPS-T1-1.**

Please see your testimony at page 16, lines 2-5, where you state that the Postal Service's "cost computations are not trustworthy." In view of your statement at page 4, line 10, that your testimony is not technical, why should the Commission believe your statement that the Postal Service's cost computations are not trustworthy?

**VP-CW/AAPS-T1-2.**

Please see your testimony at page 22, lines 18-20, where you state that "not only is the USPS not allowed to lower rates for the purpose of hurting fair competition, it is clearly instructed to consider the impact of 'increases' to avoid hurting competitors."

- a. Is it your testimony that the Postal Service may not propose competitive rates, in order to ensure competitors can charge more for their services?
- b. Is it your testimony that any rate change that causes a Postal Service competitor to lose business to the Postal Service violates the statute, because the Postal Service has not avoided hurting competitors?
- c. Is it your testimony that the Postal Service must raise its rates when its competitors raise their rates, in order to avoid hurting competitors?

**VP-CW/AAPS-T1-3.**

- a. What percentage of your customers demand day-certain delivery?
- b. What percentage of your customers receive day-certain delivery?
- c. What percentage of your volume comes with a demand for day-certain delivery?

- d. What percentage of your volume receives day-certain delivery?