

ORIGINAL

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

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POSTAL RATE AND FEE CHANGES, 1997)

Docket No. R97-1

OBJECTION OF VAL-PAK DIRECT MARKETING SYSTEMS, INC.,
VAL-PAK DEALERS' ASSOCIATION, INC., AND
CAROL WRIGHT PROMOTIONS, INC WITNESS JOHN HALDI
TO INTERROGATORY PROPOUNDED BY
NEWSPAPER ASSOCIATION OF AMERICA (NAA/VP-CW-T1-2)
(January 30, 1998)

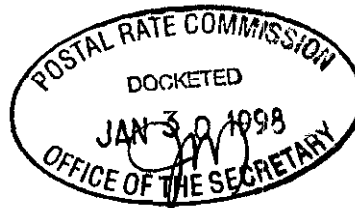
Val-Pak Direct Marketing Systems, Inc., Val-Pak Dealers' Association, Inc., and Carol Wright Promotions, Inc., d/b/a "Cox Direct," through their undersigned counsel, hereby object to Interrogatory 2 (NAA/VP-CW-T1-2) propounded to witness Haldi by the Newspaper Association of America, and served on January 20, 1998.

The interrogatory that is being objected to reads as follows:

NAA/VP/CW-T1-2. Please refer to page 8, lines 9 through 12. Please provide the following information on the 300 million pieces that Carol Wright/Cox Direct mailed in 1996. (If precise data are not available, estimates will be sufficient.)

- a. What percentage of these pieces were dropshipped to the BMC? to the SCF? and to the DDU?
- b. What percentage of these pieces were entered at the saturation rate within Standard A ECR?
- c. What percentage of these pieces were entered at the high density rate within Standard A ECR?
- d. What percentage of these pieces were entered at letter rates?
- e. What percentage of these pieces weighed in excess of the breakpoint of 3.3 ounces?

VP-CW objects to this interrogatory on the grounds that the information sought is confidential, proprietary business information, that the information sought is not relevant to



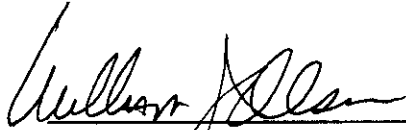
the issues in this docket, and that such information is not reasonably calculated to lead to the discovery of admissible evidence.

NAA has asked Carol Wright/Cox Direct not only to identify and break down (by point of entry) the millions of pieces it mailed in 1996, but also to quantify the volume in terms of postage rate categories based on condition of presort, shape and weight. These data are confidential, and are proprietary business information of Carol Wright/Cox Direct. Such detailed information regarding its mailings, and those of its clients, is not publicly disclosed. Carol Wright/Cox Direct believe that disclosure of this information would be adverse to its business interests.

Furthermore, the information that is sought is not relevant to the issues in this docket. These data do not in any way involve total postal volumes for the various classes, subclasses, and rate categories, which have already been provided by the Postal Service.

In conclusion, Interrogatory NAA/VP-CW-T1-2 demands information that is not relevant to this docket, is not reasonably calculated to lead to the discovery of admissible evidence, and which is proprietary and confidential business information that should not be required to be disclosed in this case.

Respectfully submitted,



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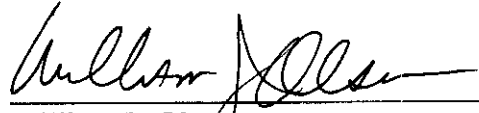
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Counsel for Val-Pak Direct Marketing Systems, Inc.,
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Carol Wright Promotions, Inc.

CERTIFICATE OF SERVICE

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



William J. Olson

January 30, 1998