

DOCKET SECTION

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

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POSTAL RATE AND FEE CHANGES, 1997)

POSTAL RATE AND FEE CHANGES
OFF Docket No: R97-1

VAL-PAK DIRECT MARKETING SYSTEMS, INC. AND
VAL-PAK DEALERS' ASSOCIATION, INC.
AND CAROL WRIGHT PROMOTIONS, INC.,
DESIGNATION OF WRITTEN AND ORAL CROSS-EXAMINATION
OF ABA/EEI/NAPM WITNESS JAMES CLIFTON (ABA/EEI/NAPM-T-1)
(February 18, 1998)

Written Cross-Examination

Pursuant to Rule 4A of the Postal Rate Commission's Special Rules of Practice (Presiding Officer's Ruling No. R97-1/4) and Presiding Officer's Ruling No. R97-1/90, Val-Pak Direct Marketing Systems, Inc., Val-Pak Dealers' Association, Inc., and Carol Wright Promotions, Inc., d/b/a "Cox Direct," hereby designate the following responses to interrogatories as their written cross-examination of ABA/EEI/NAPM witness Clifton:

VP-CW/ABA/EEI/NAPM-T1-1-9

Pursuant to Rule 4A, two copies of the above documents are submitted herewith to the Secretary of the Commission.

Additionally, these intervenors request the right to designate at the hearing additional responses to their and other discovery to this witness, the responses to which have not yet been received.

Oral Cross-Examination

Further, pursuant to Rule 4B of the Special Rules of Practice, Val-Pak Direct Marketing Systems, Inc., Val-Pak Dealers' Association, Inc. and Carol Wright Promotions, Inc., request permission to conduct oral cross-examination regarding his testimony and responses to interrogatories (especially those identified above), and First-Class and Standard A Mail rate design.

Respectfully submitted,



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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

February 18, 1998