

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

Retail Access Optimization Initiative, 2011

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Docket No. N2011-1

MOTION OF VALPAK DIRECT MARKETING SYSTEMS, INC. AND
VALPAK DEALERS' ASSOCIATION, INC.
TO ADMIT INTO EVIDENCE THE RESPONSES OF
UNITED STATES POSTAL SERVICE WITNESS JAMES J. BOLDT (USPS-T-1)
TO INTERROGATORIES VP/USPS-T1-4 AND 12
(September 28, 2011)

Pursuant to Commission Rules of Practice and Procedure § 3001.21, Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc. (hereinafter "Valpak") hereby move for admission into evidence and incorporation into the record the following responses to interrogatories of United States Postal Service witness Boldt:

VP/USPS-T1-4 and 12 (September 21, 2011) as updated (September 26, 2011)

Two copies of the above documents are submitted herewith to the Secretary of the Commission.

Valpak filed interrogatories VP/USPS-T1-1-12 on August 30, 2011. The Postal Service filed the above-referenced responses on September 21, 2011 and revised the response on September 26, 2011, subsequent to the hearing on September 8, 2011, wherein the Postal Service testimony and written discovery were received into the record. Therefore, this motion should be considered timely. Furthermore, the Postal Service has stated that they do not oppose this motion.

Valpak believes that witness Boldt's responses to interrogatories VP/USPS-T1-4 and 12 provide important information relevant to the issues in this docket and should be part of the evidentiary record.

Respectfully submitted,

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