

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Notice of Market Dominant)
Price Adjustment) Docket No. R2015-4
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**VALPAK DIRECT MARKETING SYSTEMS, INC. AND
VALPAK DEALERS' ASSOCIATION, INC.
MOTION FOR ISSUANCE OF INFORMATION REQUEST
(January 23, 2015)**

Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc. (hereinafter "Valpak"), pursuant to Rule 3001.21(a), hereby move the Commission to issue an Information Request seeking additional clarifying data and explanation from the Postal Service concerning the Standard Mail Class. The FY 2010 ACD remedial order required the Postal Service "present a schedule of future above-CPI price increases for Standard Mail Flats ... updated with each subsequent Market Dominant Price Adjustment and ACR until the revenue of the Flats product exceeds its attributable cost." (P. 107.) That remedial order also required that "In subsequent Notices of Market Dominant Price Adjustments, the Postal Service shall report the following information: • an explanation of how the proposed prices will move the Flats cost coverage toward 100 percent, and • a statement estimating the effect that the proposed prices will have in reducing the subsidy of the Flats product." *Id. See also* FY 2012 ACD, p. 116. These directives were ignored by the Postal Service in its Notice of Market-Dominant Price Adjustment (Jan. 15, 2015).

Proposed Questions

1. Pursuant to the Commission directives in the 2010 Annual Compliance Determination (ACD), please provide:
 - a. An updated schedule of future above-CPI price increases for Standard Mail Flats.
 - b. An explanation of how the proposed prices for Standard Mail Flats will move the Flats cost coverage toward 100 percent.
 - c. A statement estimating the effect that the proposed prices will have in reducing the intra-class subsidy of the Flats product.
 - d. All workpapers and data used to respond to subparts b and c.
2. Please explain why the information required by the Commission in its FY 2010 ACD was not provided in the Postal Service's Notice of Market-Dominant Price Adjustment (Jan. 15, 2015).

Respectfully submitted,

William J. Olson
Jeremiah L. Morgan
John S. Miles
WILLIAM J. OLSON, P.C.
370 Maple Ave. W, Suite 4
Vienna, Virginia 22180-5615
(703) 356-5070

Counsel for:
Valpak Direct Marketing Systems, Inc. and
Valpak Dealers' Association, Inc.