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

POSTAL RATE AND FEE CHANGES, 2005) Docket No. R2005-1

VALPAK DIRECT MARKETING SYSTEMS, INC. AND VALPAK DEALERS' ASSOCIATION, INC. FOURTH INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE WITNESS ALTAF H. TAUFIQUE (VP/USPS-T28-48-51)

(May 27, 2005)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc. hereby submit interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

Respectfully submitted,

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

May 27, 2005

VP/USPS-T28-48.

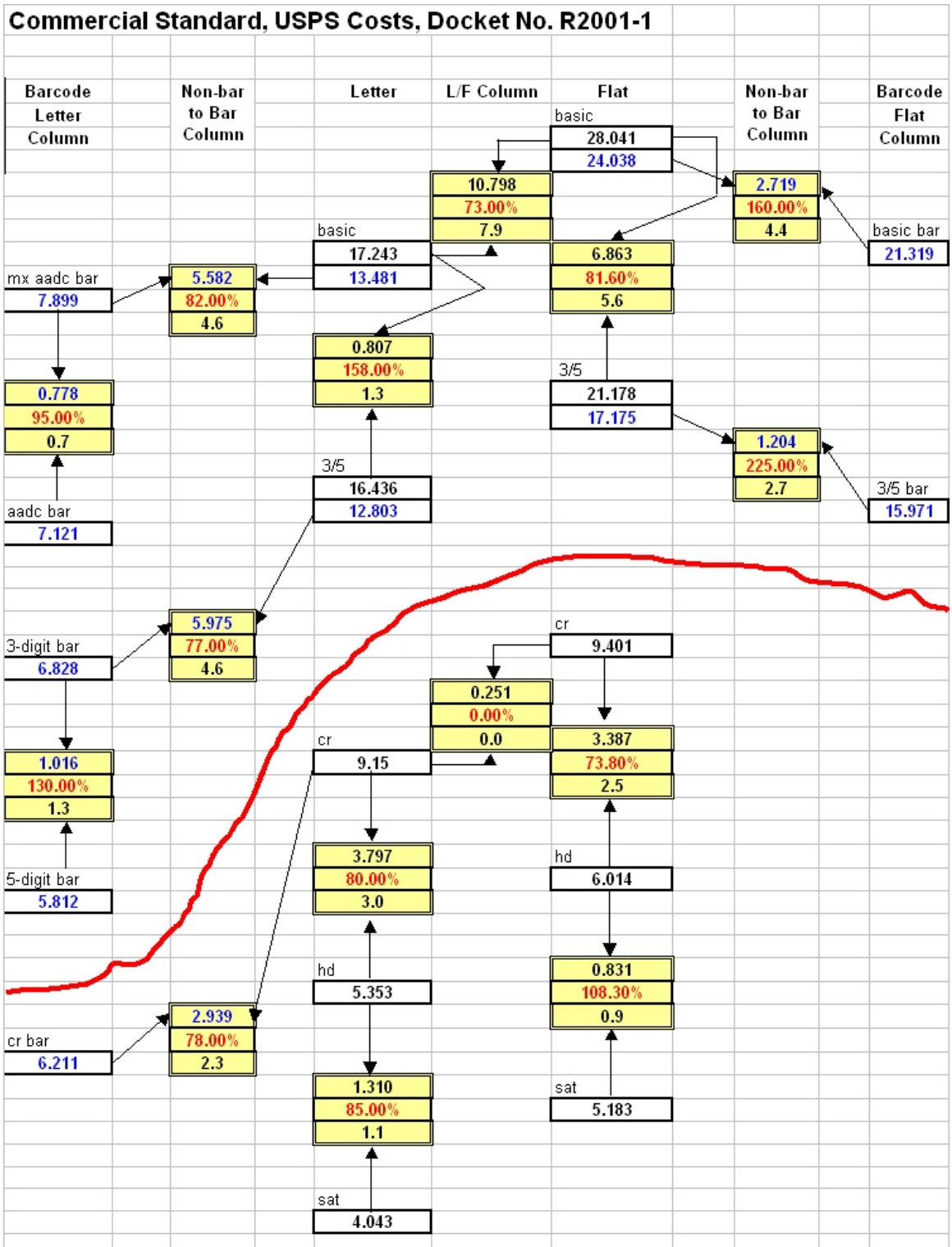
In presort-tree form, Chart Nos. 1 and 2 attached show costs (cents per piece), workshare-related and not, as appropriate, for Standard Regular (above the uneven line) and Standard ECR (below the uneven line) mail. Chart No. 1 is for the commercial category, and Chart No. 2 is for the nonprofit category. Both charts show USPS costs from Docket No. R2001-1, upon which the current rates are based, which in turn would be elevated by the Postal Service's across-the-board proposal in the instant docket, thus perpetuating relative rate levels.

The columns on each chart are labeled. Boxes with **one** layer set out either total or workshare-related costs, as appropriate. Boxes with **two** layers set out total costs on the top layer and workshare-related costs on the bottom layer. Boxes with **three** layers set out a cost difference in the top layer, a percentage passthrough in the middle layer, and a rounded discount in the bottom layer. The arrows show the sources of the cost differences.

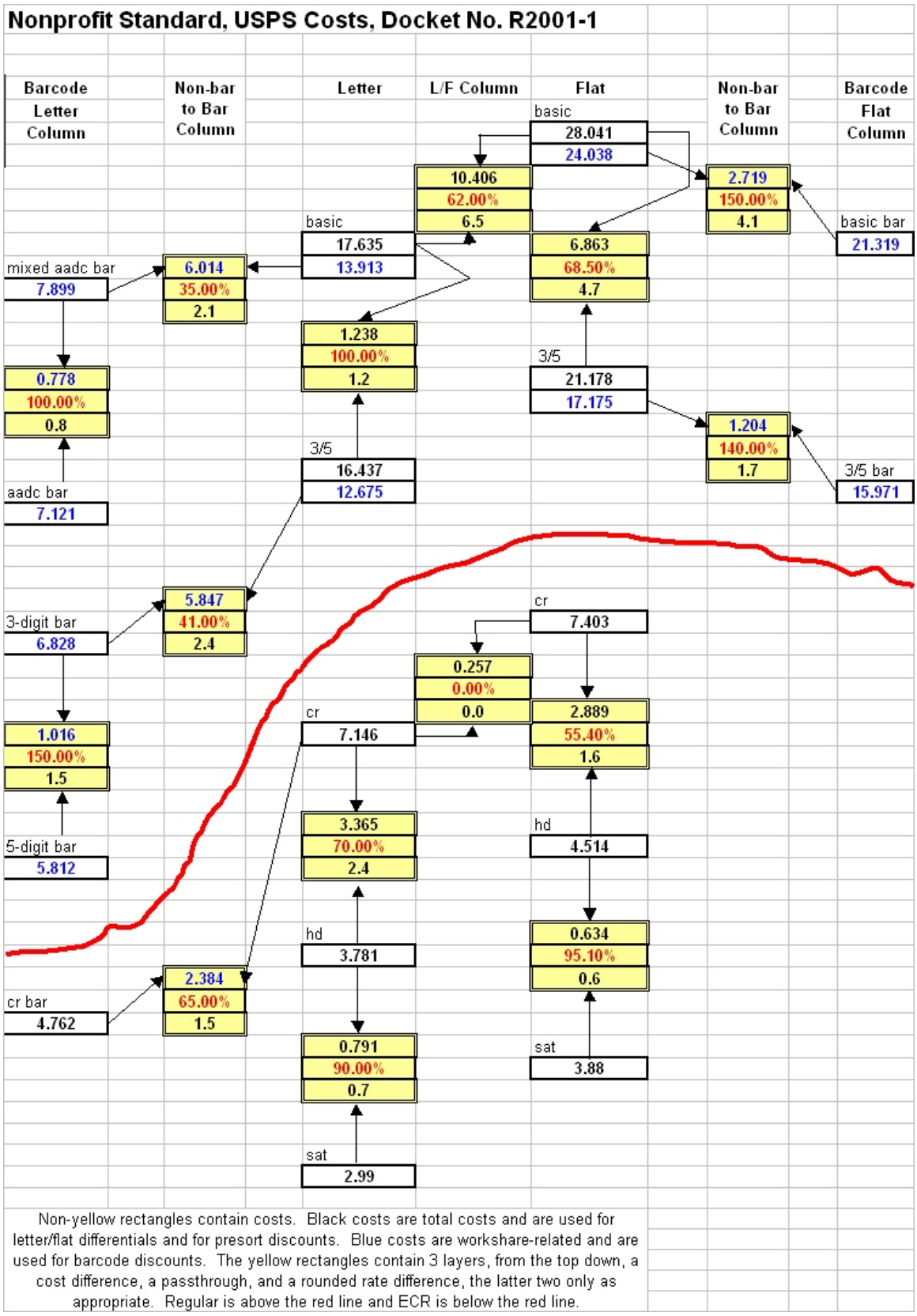
a. With respect to the columns labeled (i) barcode letter, (ii) letter, (iii) flat, and (iv) barcode flat, please confirm that the cost shown in each single-layer box is correct. If any are incorrect, please provide the correct cost and a reference to its source.

b. With respect to the columns labeled (i) letter and (ii) flat, please confirm that the unit cost in each of the double-layer boxes is correct. If any are incorrect, please provide the correct cost and a reference to its source.

Attachment to VP/USPS-T28-48, Chart No. 1



Attachment to VP/USPS-T28-48, Chart No. 2



VP/USPS-T28-49.

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The columns on each chart are labeled. Boxes with **one** layer set out either total or workshare-related costs, as appropriate. Boxes with **two** layers set out total costs on the top layer and workshare-related costs on the bottom layer. The largest boxes with **three** possible layers set out a cost difference in the top layer, with the second two layers empty. The arrows show the sources of the cost differences.

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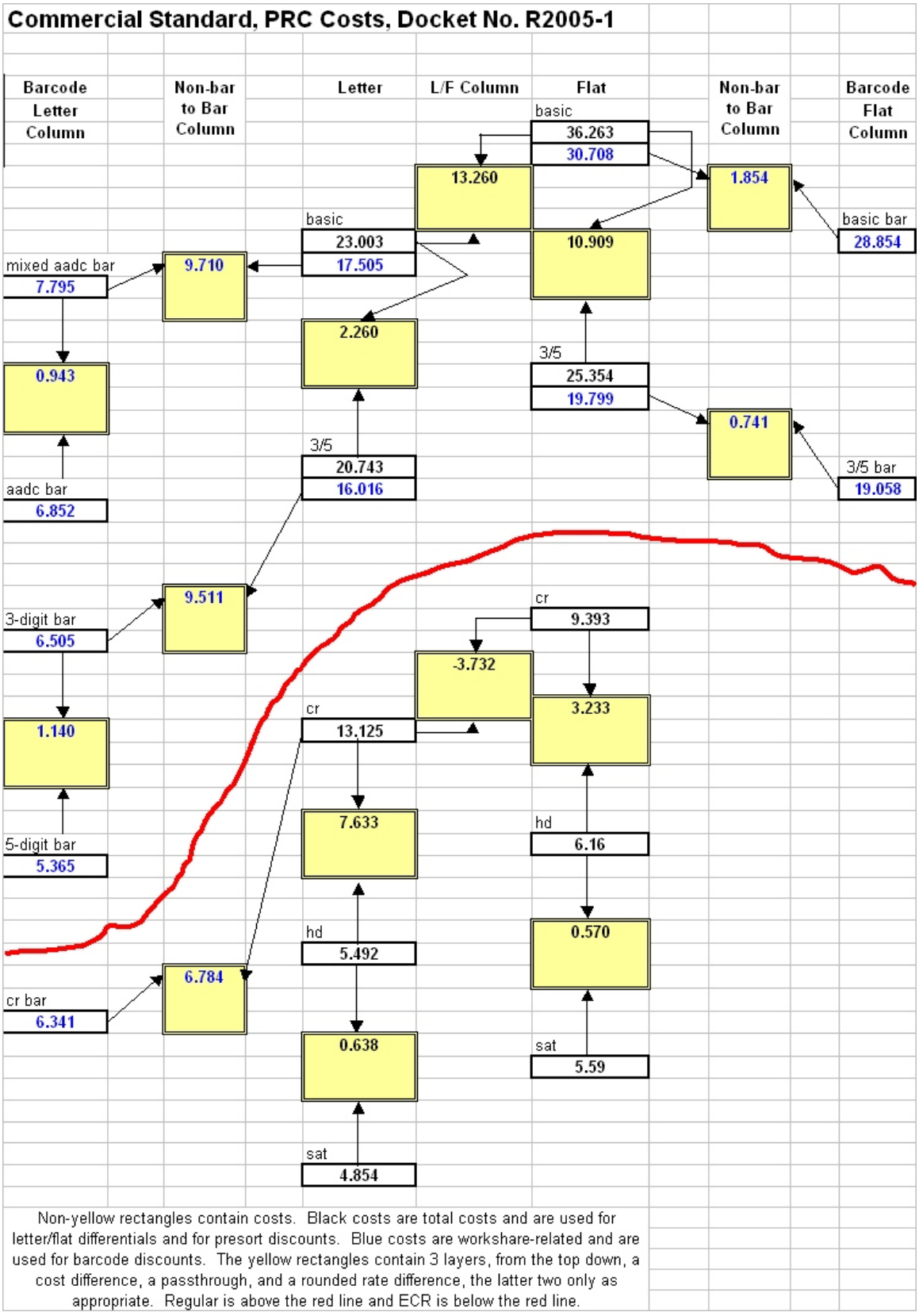
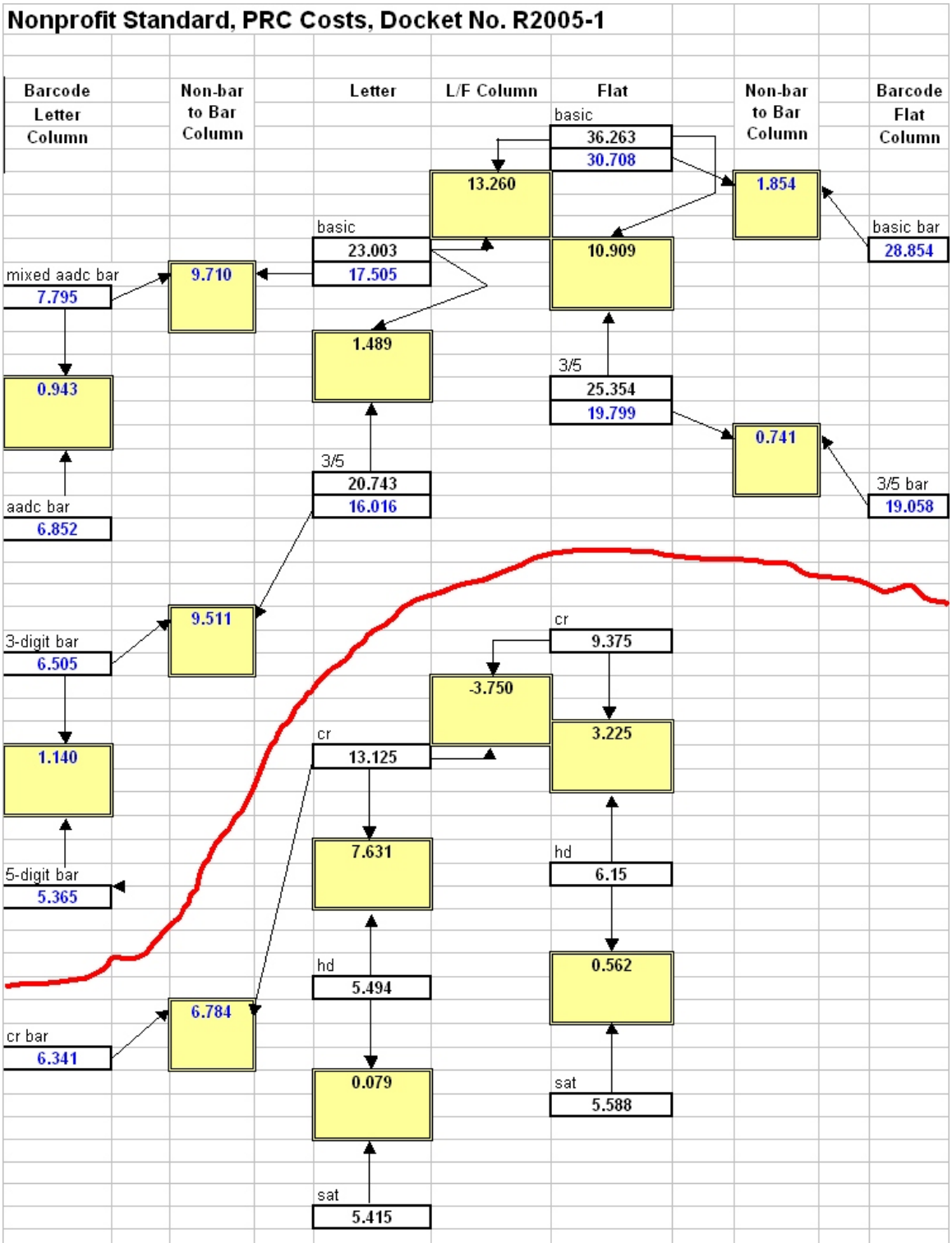


Attachment to VP/USPS-T28-49, Chart No. 2



VP/USPS-T28-50.

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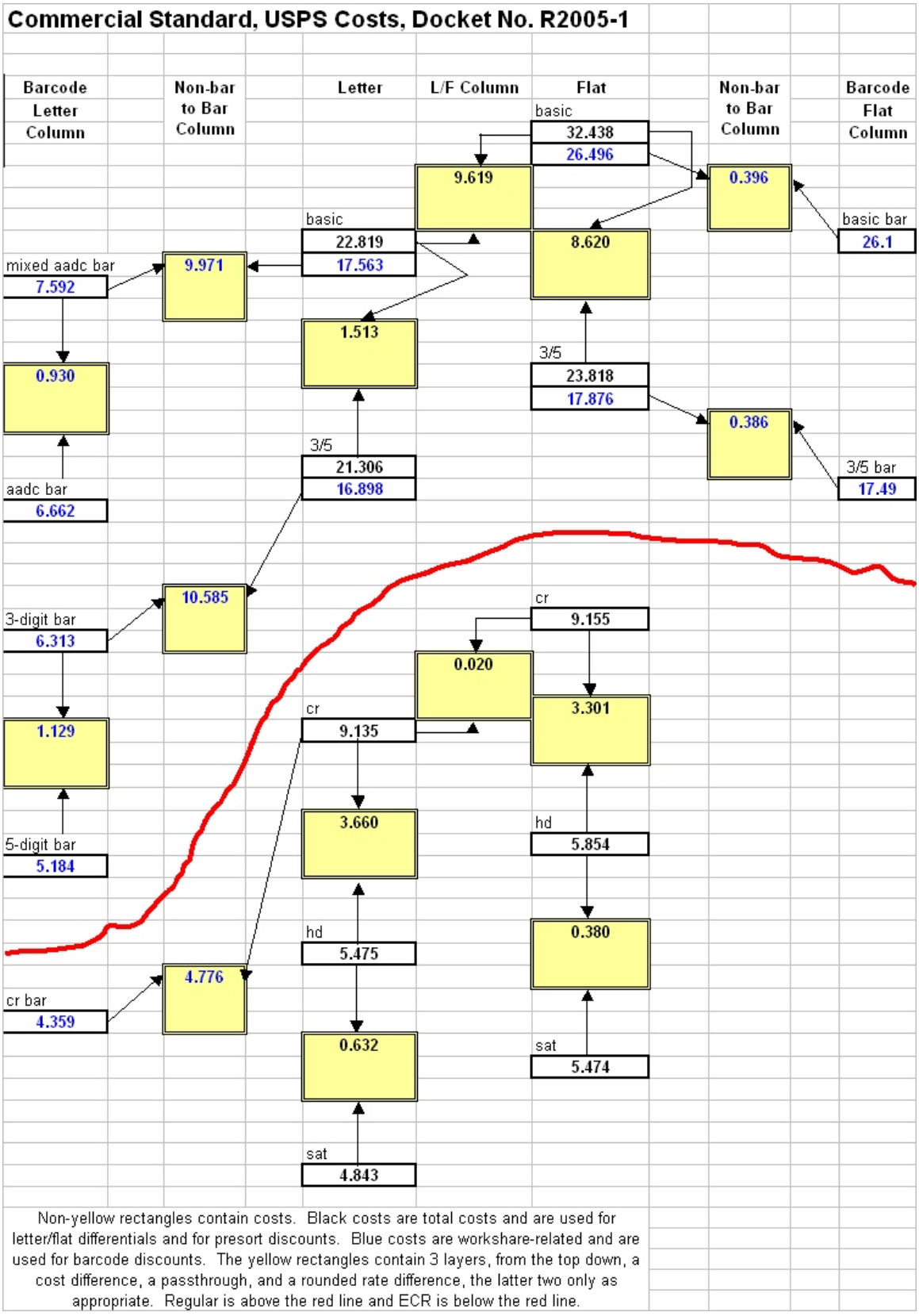
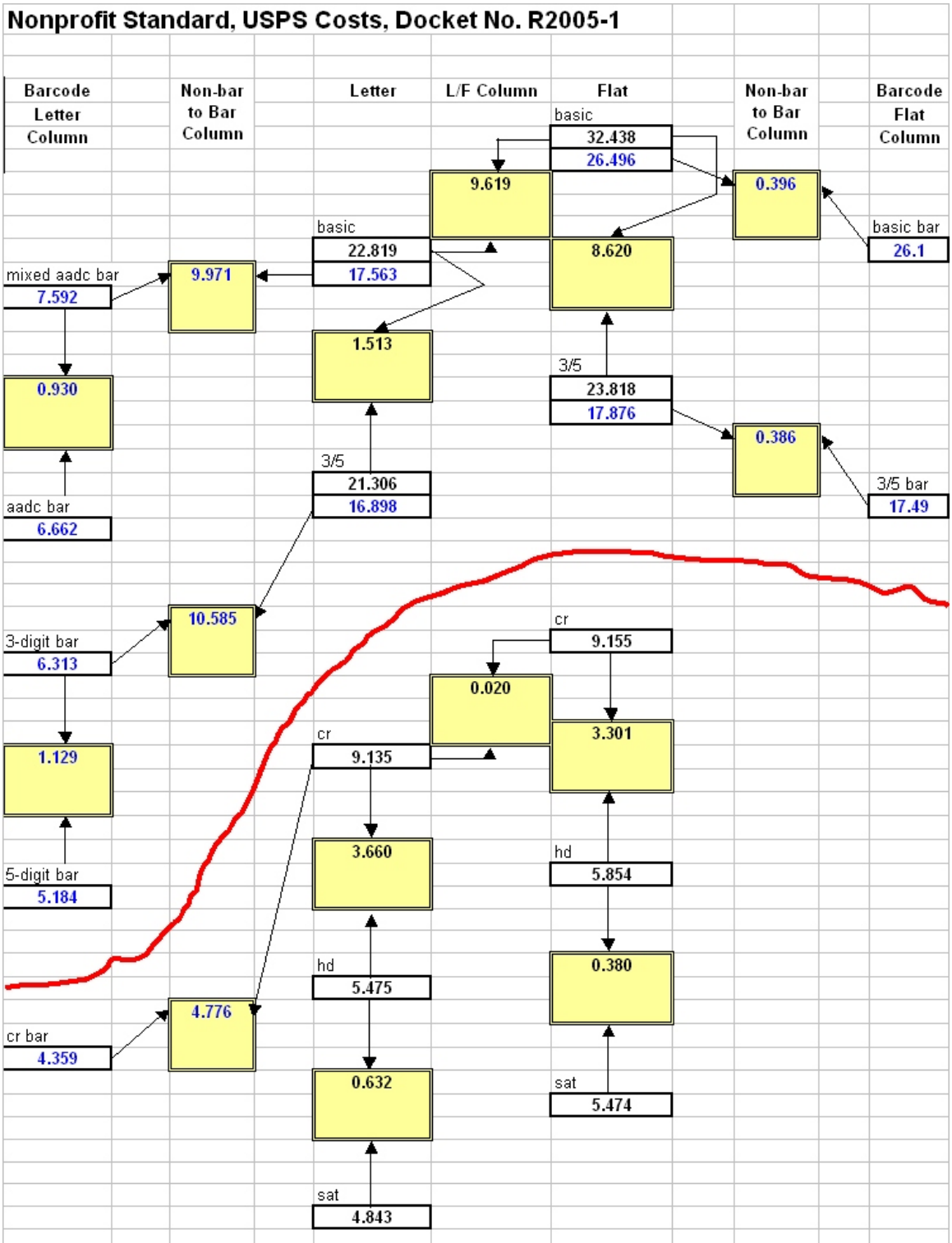
Attachment to VP/USPS-T28-50, Chart No. 1



Attachment to VP/USPS-T28-50, Chart No. 2



VP/USPS-T28-51.

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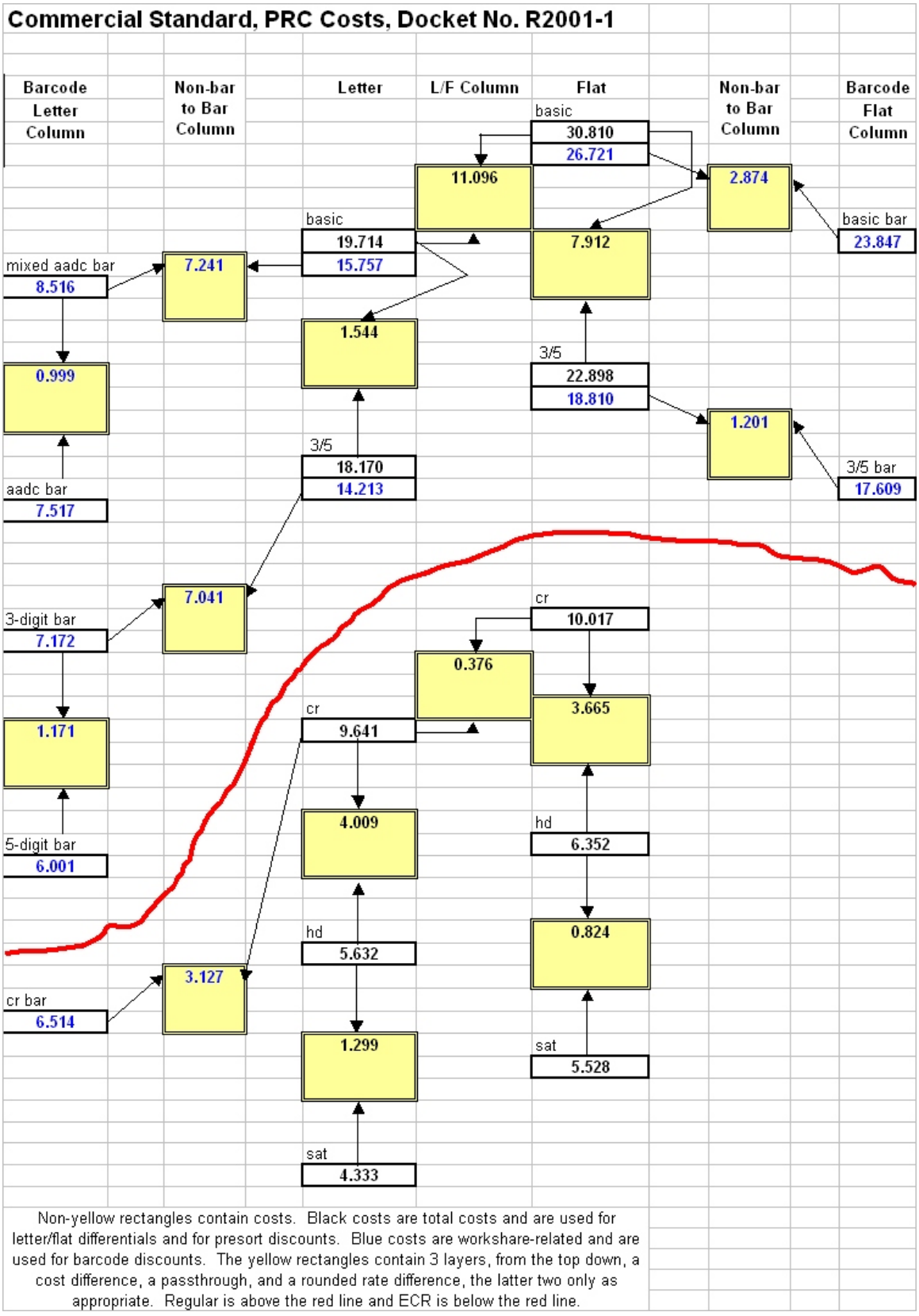
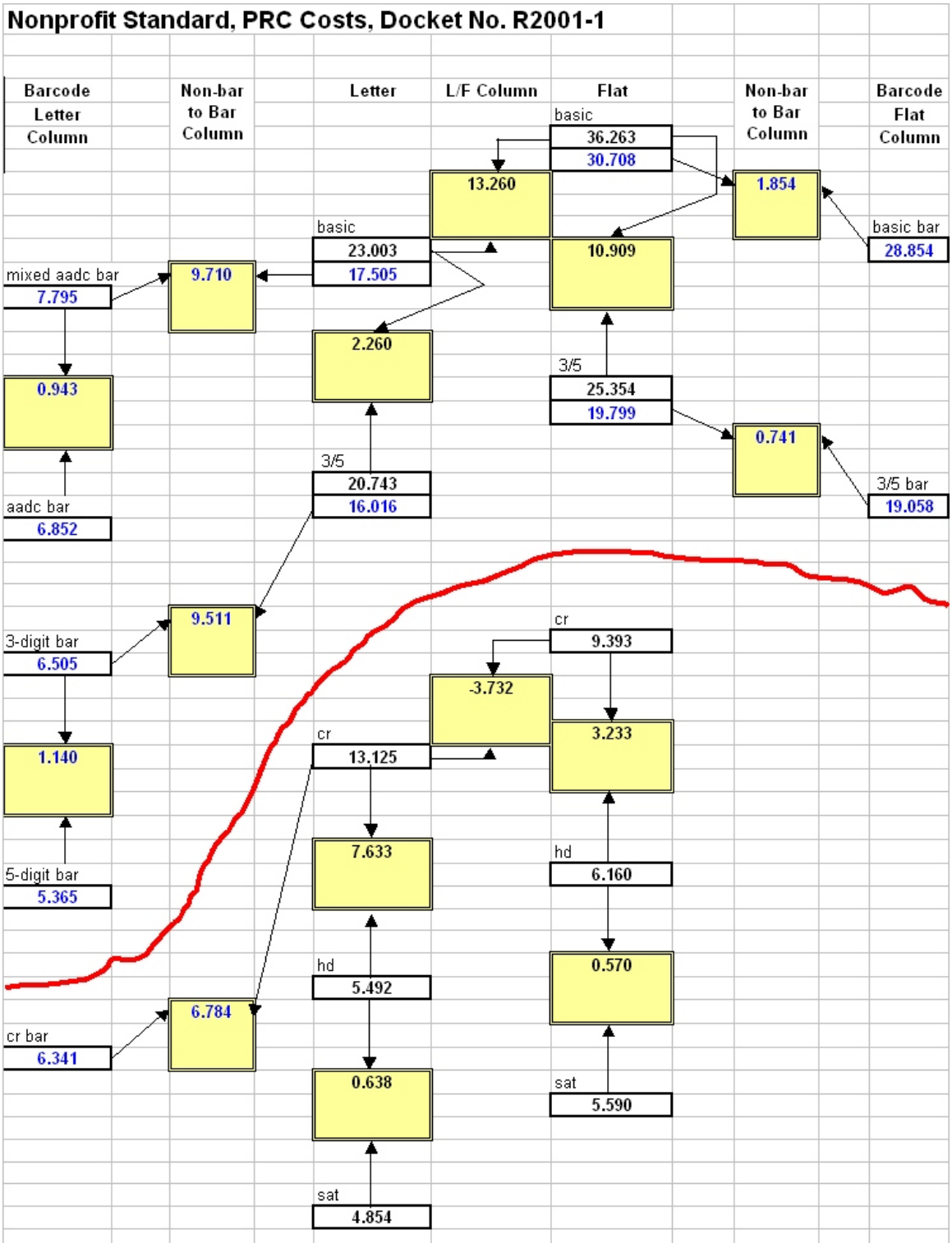
Attachment to VP/USPS-T28-51, Chart No. 2