

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS  
DANIEL TALMO TO INTERROGATORY OF VALPAK DIRECT  
MARKETING SYSTEMS, INC. AND VALPAK DEALERS'  
ASSOCIATION, INC., REDIRECTED FROM WITNESS KIEFER  
(VP/USPS-T36-2(d) and (i))  
(May 30, 2006)

The United States Postal Service hereby provides the response of Postal Service witness Talmo (USPS-T-27) to interrogatory VP/USPS-T36-2, parts (d) and (i), which have been redirected from witness Kiefer (USPS-T-36).

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF POSTAL SERVICE WITNESS TALMO  
TO VALPAK INTERROGATORY

**VP/USPS-T36-2.** In Regular Standard, please refer to the rates proposed at the minimum per-piece level for mixed ADC flats of 43.1 cents (per piece) and for mixed ADC letters of 29.2 cents, both machinable. (See, e.g., Request, Attachment A, pp.11-12, Rate Schedule 321A.)

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(d) Please confirm that USPS-LR-K-119, Docket No. R2005-1, showed the cost for all Regular Standard letters, exclusive of mail processing and carrier costs, to be 0.6417 cents, and that Postal Service witness Yorgey, in Docket No. MC2005-3, USPS-T-2 (see, e.g., p. 4 of Appendix A), used the figure of 0.6417 cents as the cost of letters beyond mail processing and carrier costs. If you do not confirm, please provide alternative add-on costs, identifying their source. Also, please update the cost of 0.6417 cents to the instant docket and FY 2008.

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(i) Please confirm that USPS-LR-K-119, Docket No. R2005-1, showed the costs for flats, exclusive of mail processing and carrier costs, to be 2.6155 cents, and that Postal Service witness Yorgey, in Docket No. MC2005-3, USPS-T-2 (see, e.g., p. 6 of Appendix A), used the figure of 2.6155 cents as the cost of flats beyond mail processing and carrier costs. If you do not confirm, please provide alternative add-on costs, identifying their source. Also, please update the cost of 2.6155 cents to the instant docket and FY 2008.

**RESPONSE:**

(d) Confirmed. Please see USPS-LR-L-135 for the update to USPS-LR-K-119.

(i) Confirmed. Please see USPS-LR-L-135 for the update to USPS-LR-K-119.