

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

POSTAL RATE AND FEE CHANGES, 2006)

Docket No. R2006-1

VALPAK DIRECT MARKETING SYSTEMS, INC. AND
VALPAK DEALERS' ASSOCIATION, INC.
SECOND INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS MICHAEL D. BRADLEY (VP/USPS-T14-13-14)
(June 21, 2006)

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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VP/USPS-T14-13.

Please refer to POIR No. 4, and the 2004 City Carrier Street Time Study (“CCSTS”) referred to in Questions 4 through 10 thereof. With respect to the 2004 CCSTS:

- a. Over what time period were the data collected?
- b. How many ZIP areas did the study include?
- c. How many carrier routes did the study include?
- d. What was the total number of observations (route-days) in the study prior to any editing?
- e. Of the ZIP areas included in the 2004 study, what percentage also was included in the 2002 study? That is, what was the extent of overlap, if any, between the ZIP areas and routes in the 2002 CCSTS and the ZIP areas and routes in the 2004 CCSTS?

VP/USPS-T14-14.

With respect to the CCSTS discussed in your response to VP/USPS-T14-12:

- a. Were the raw data from the 2004 CCSTS edited in any way?
- b. If your response to part a is in the affirmative, over what time period were the data edited?
- c. Was the editing process completed? If so, when?
- d. Were the criteria used to edit the 2002 CCSTS also used to edit the 2004 CCSTS? If not, please describe each way in which the criteria used to edit the 2004 CCSTS differed from the criteria used to edit the 2002 CCSTS.

- e. How many observations were deleted, or rejected, from the 2004 CCSTS, and what were the bases for such rejections?
- f. What was the total number of usable observations (route-days) in the study after all editing was complete?
- g. If size or quality of the edited data base from the 2004 CCSTS differed materially, or in any critical way, from the size or quality of the edited data base in the 2002 CCSTS, please describe all such differences.