

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.
FIRST FOLLOW-UP INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS JOYCE K. COOMBS (VP/USPS-T44-36)
(July 28, 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-T44-36.

Please refer to witness McCrery's response to ADVO/USPS-T42-1 and your response to ADVO/USPS-T42-19, redirected from witness McCrery. Witness McCrery, in his response to ADVO/USPS-T42-1, stated that 5-Digit Pallets with CR bundles or sacks are cross-docked for transportation to the delivery unit. Your response to ADVO/USPS-T42-1 states that 66 percent of post offices, stations, branches, delivery distribution centers, and carrier annexes cannot handle pallets.

- a. If 66 percent of delivery units are not capable of handling pallets, why are the pallets cross-docked at the destination processing plant to those delivery units without the pallet handling capability?
- b. At those delivery units not capable of handling pallets, how are the pallets handled?