

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.
FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS SAMUEL T. CUTTING (VP/USPS-T26-1)
(April 28, 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,

William J. Olson
John S. Miles
Jeremiah L. Morgan
WILLIAM J. OLSON, P.C.
8180 Greensboro Drive, Suite 1070
McLean, Virginia 22102-3860
(703) 356-5070

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

April 28, 2005

VP/USPS-T26-1.

Please refer to library reference USPS-LR-J-59, Docket No. R2001-1, which provides cost information underlying the current rates, the relative levels of which would be perpetuated by the across-the-board proposal in this case. Please refer also to library reference USPS-LR-K-107, which is a **current** version of the same analysis, at PRC costing.

- a. Please confirm that USPS-LR-J-59 is at USPS costing. If you do not confirm, please explain the costing contained therein.
- b. If you do confirm that USPS-LR-J-59 is at USPS costing in part a, please provide a version of LR-J-59 at PRC costing, using the same base year as USPS-LR-J-59. That is, no updating is being requested, just a PRC version that might have been filed, or prepared for filing, during Docket No. R2001-1.