

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 COOMBS
TO INTERROGATORY OF VALPAK (VP/USPS-T30-8.a),
REDIRECTED FROM WITNESS KELLEY (USPS-T-30)
(June 16, 2006)

The United States Postal Service hereby provides the response of witness Coombs to the following interrogatory of ValPak, Inc., filed on June 2, 2006: VP/USPS-T30-8.a, redirected from witness Kelley (USPS-T-30).

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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June 16, 2006

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO
INTERROGATORIES OF VALPAK
(Redirected from Witness Kelley, USPS-T-30)**

VP/USPS-T30-8.

The testimony by witness Coombs (USPS-T-44) notes at page 13, lines 2-3, that “[h]aving to case the host flat pieces would be logistically more challenging than simply casing the letter-shaped DAL cards.”

a. Is casing of host flat pieces logistically more challenging than casing ordinary flats, such as enveloped flats or catalogs? In your response, please assume that weight of the host flat pieces and other flats is equal.

RESPONSE:

- a. It is generally easier to case flat-shaped pieces that are enveloped or bound in some manner than it is to case a piece that is considered a wrap or host piece.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Eric P. Koetting

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