

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.  
FIFTH INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS JAMES W. PAGE (VP/USPS-T23-5)  
(July 10, 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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Valpak Dealers' Association, Inc.

**VP/USPS-T23-5.**

Please refer to your response to VP/USPS-T36-10(e), where you provide aggregate TYBR (\$946,000) and TYAR (\$820,000) adjustments for the three NSAs.

- a. Please clarify whether these cost figures are for Commercial Regular, Commercial ECR, Commercial Regular and Commercial ECR combined, or some broader group of subclasses.
- b. Please explain the relationship of these cost figures to the sum of the numbers in cell E25 on the 'Summary' tab of each of Bank OneChase-USPS.xls, HSBC-USPS.xls, and Discover-USPS.xls, in USPS-LR-L-59.
- c. Please provide NSA cost adjustments, BR and AR, for the categories of Commercial Regular and Commercial ECR separately, at both USPS and PRC costing.
- d. Please state whether these cost adjustments have been removed from both the TYBR and TYAR total costs by subclass provided by witness Waterbury (USPS-T-10) in:
  - (i) USPS-LR-L-7 (R2006\_TY2008BR\_USPS.DRpt.xls and R2006\_TY2008AR\_USPS.DRpt.xls); and
  - (ii) USPS-LR-L-96 (R2006\_TY2008BR\_PRC.DRpt.xls and R2006\_TY2008AR\_PRC.DRpt.xls).