

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.
FOURTH INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS MARC D. MCCRERY (VP/USPS-T42-28)
(July 11, 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-T42-28.

- a. For a DBCS machine, what is the minimum volume (or minimum time) required to make sorting of letter mail on a particular sort scheme economically efficient? That is, what is the volume (or time) below which it would be more practical to use some alternative, such as:
 - (i) Where feasible, consolidation with letter mail from another class that requires the sortation on the same sort scheme, or
 - (ii) Manual sortation?

- b. For an AFSM 100, what is the minimum volume (or minimum time) required to make sorting of flats on a particular sort scheme economically efficient? That is, what is the volume (or time) below which it would be more practical to use some alternative, such as:
 - (i) Where feasible, consolidation with flat mail from another class or subclass that requires sortation on the same sort scheme, or
 - (ii) Manual sortation?