

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.
SECOND INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
UNITED STATES POSTAL SERVICE (VP/USPS-2)
(July 13, 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-2.

Please refer to the response to VP/USPS-T3-4, redirected to the Postal Service from witness Pafford.

- a. Regarding the data on DALs for March and April 2006 that were extracted by an analysis of PostalOne, what percentage of the total volume of ECR mail was represented by the facilities that reported the DAL volume through PostalOne in that special analysis?
- b. Will the DAL data collection process described by witness Kiefer in his rebuttal testimony (USPS-RT-1, p. 32, ll. 11-15) in Docket No. R2005-1 be completed by the end of FY 2006? If not, by what date does the Postal Service expect to finish the process?
- c. Please provide an estimate of the volume of DALs for the five months from May 2006 through September 2006, as soon as it can be made available.
- d. If analysis of the volume of DALs during any of the months within the period May 2006 through September 2006 can be generated prior to the hearings on the Postal Service case-in-chief (currently scheduled to begin August 2, 2006), please provide that analysis by such date.