

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
PAUL RIDDLE TO INTERROGATORIES OF VALPAK DIRECT MARKETING SYSTEMS, INC.
AND VALPAK DEALERS' ASSOCIATION, INC.,
REDIRECTED FROM WITNESS HARAHAUSH
(VP/USPS-T4-4(b), 6)

The United States Postal Service hereby provides the responses of witness Paul Riddle to the following interrogatories of the Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc.: VP/USPS-T4-4(b), 6, filed on July 12, 2006, and redirected from witness Harahush.

Each interrogatory is stated verbatim and followed by the response:

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 26, 2006

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAUL RIDDLE
TO INTERROGATORY OF VALPAK, REDIRECTED FROM WITNESS HARAHUSH**

VP/USPS-T4-4.

For the universe of flats delivered by the Postal Service, please provide the following information and indicate the source(s) used:

* * * * *

- b. What proportion or share of all flats is delivered by rural carriers?

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RESPONSE:

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- b. The RCCS records compensation category, not the shape (please see the responses to NAA/USPS-T5-1 and PSA/USPS-T14-4i). Flats could be recorded in one of several compensation categories, depending on extra services, address format, and whether or not the mail piece could be cased. Therefore, total volume of all flats delivered by rural carriers is not available.

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAUL RIDDLE
TO INTERROGATORY OF VALPAK, REDIRECTED FROM WITNESS HARAHUSH**

VP/USPS-T4-6.

Please provide a table that (i) is similar in format to your Table 2, and (ii) shows the FY 2005 proportions of flat-shaped mail volume delivered by rural carriers.

RESPONSE:

The RCCS records compensation category, not the shape (please see the response to NAA/USPS-T5-1). The FY2005 proportions of mail in the flats compensation category are provided in Table 4 of my testimony. FY2005 proportions of flat-shaped mail delivered by rural carriers are not available.