

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF VALPAK (VP/USPS-T44-34.a., b.),
REDIRECTED FROM WITNESS COOMBS
(July 28, 2006)

The United States Postal Service hereby provides its response to the following interrogatories of ValPak, Inc., filed on July 14, 2006: VP/USPS-T44-34.a., b., redirected from witness Coombs.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 28, 2006

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF VALPAK, REDIRECTED FROM WITNESS COOMBS**

VP/USPS-T44-34.

An article "Mail Goes Where the Money Is," by Marshall Kolin and Edward J. Smith, in *Emerging Competition in Postal and Delivery Services* (Kulwer Academic Publishers, 1999), pages 159-179, indicates that higher volumes of mail, on a per capita basis, are delivered in areas where residents have higher-than-average incomes. The FY2005 Billing Determinants (USPS-LR-L-77) indicate that the total volume of saturation mail was 13.8 billion pieces (both letters and flats).

- a. Does the Postal Service maintain records that indicate the concentration of mail by Zip code? If so, please provide.
- b. Does the Postal Service maintain any records that indicate the concentration of ECR saturation mail by Zip code area? If so, please provide.

RESPONSE:

a.-b. No, the Postal Service does not have Billing Determinant volumes broken out by ZIP Code.

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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