

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.
FIRST FOLLOW-UP INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS JOHN P. KELLEY (VP/USPS-T15-1)
(July 31, 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-T15-1.

Please refer to your response to UPS/USPS-T15-6.

- a. Are these non-volume variable product specific costs of the network, discussed in your response, attributed to Priority Mail and First-Class Mail?
- b. If your answer to preceding part a is affirmative, what basis is used to distribute these product specific costs to Priority Mail and First-Class Mail (*e.g.*, weight, volume, some combination of the two, or something else)?