

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

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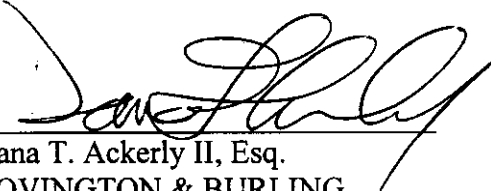
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**INTERROGATORIES OF  
THE DIRECT MARKETING ASSOCIATION, INC.  
TO USPS WITNESS VAN-TY-SMITH**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached interrogatories to USPS witness Van-Ty-Smith: DMA/USPS-T17, Nos. 3-5. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,

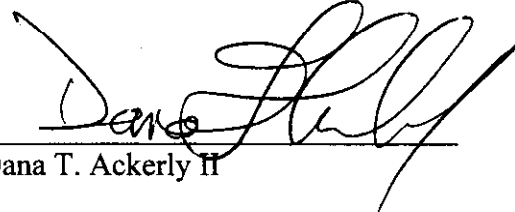


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Counsel for the Direct Marketing  
Association, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Commission's Rules of Practice.

  
Dana T. Ackerly II

Dated: February 3, 2000

**DMA/USPS-T17-3.** Please refer to Table 2 (page 26) of your testimony. For each percentage figure in this table, please provide the corresponding total number of tallies and the corresponding total tally dollar amount of those tallies.

**DMA/USPS-T17-4.** For each facility grouping, please provide the percentage of dollar-weighted direct tallies by class and subclass. Also provide the corresponding total number of direct tallies for each class and subclass of each facility grouping, and the total tally dollar amount of the direct tallies for each class and subclass of each facility grouping.

**DMA/USPS-T17-5.** Please refer to programs MBC, MOD1POOL, NONMOD1, and BMC1 associated with LR-I-106. Running these programs on the IOCS data file produces datasets containing three activity codes that are not referenced in Tables B-1 or B-2 of USPS LR-I-1. These activity codes are 2068, 3068, and 4068. From program MOD1POOL (lines 06940002-06960002), it appears that these activity codes are related, respectively, to the activity codes 2060, 3060, and 4060. Please confirm that the shape, class, and subclass information for activity codes 2068, 3068, and 4068 is the same as for the corresponding activity codes 2060, 3060, and 4060, respectively. If this is not the case, please provide the appropriate shape, class, and subclass information for these activity codes.