

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

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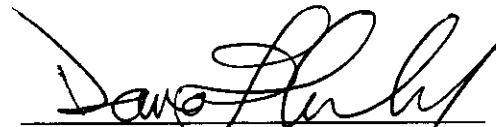
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**INTERROGATORIES OF
THE DIRECT MARKETING ASSOCIATION, INC.
TO USPS WITNESS DEGEN**

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 Degen: DMA/USPS-T16, Nos. 1-3. 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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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 14, 2000

DMA/USPS-T16-1. Please refer to Appendix A of LR-I-115 and Table 8 on Page 66 of your testimony.

- a. Please confirm that the 1995 platform survey collected information about single-piece handlings and item handlings as well as information on container handlings. If not confirmed, please explain.
- b. Individually for each shape of mail, please provide (using data from the 1995 platform study) a subclass profile of single pieces being handled at the platform. Please provide the profile in an electronic spreadsheet in a form similar to Table 8 of your testimony.
- c. Individually for each item type, please provide a subclass profile (using data from the 1995 platform study) of single items being handled at the platform. Please provide the profile in an electronic spreadsheet in a form similar to Table 8 of your testimony.
- d. Individually for each item type and mail shape, please provide a subclass profile (using data from the 1995 platform study) of items and loose pieces in identical containers being handled at the platform. Please provide the profile in an electronic spreadsheet in a form similar to Table 8 of your testimony.
- e. Individually for each item type and mail shape, please provide a subclass profile (using data from the 1995 platform study) of items and loose pieces in non-identical containers being handled at the platform. Please provide the profile in an electronic spreadsheet in a form similar to Table 8 of your testimony.
- f. What percentage of container tallies in the 1995 platform study was for identical containers?

DMA/USPS-T16-2. Please refer to question 4a on page 8 of Appendix A of LR-I-115.

- a. For tallies where the employee was working "inbound transportation", in what percentage of handling tallies was the mail or equipment being handled "staying within the operation"? In what percentage of handling tallies was the mail or equipment proceeding to another operation within the facility? Please provide an operation profile of where the mail or equipment is going after the handling.
- b. For tallies where the employee was working "outbound transportation", in what percentage of handling tallies was the mail or equipment being handled coming from another operation within the facility? Please provide an operation profile of where the mail or equipment came from.

DMA/USPS-T16-3. Please refer to Table 8 on Page 66 of your testimony.

a. Were the percentages in the column labeled "FY95 Platform Study Distribution" developed using all container handling data from the platform study or just data for non-identical containers? If the figures were developed using data for all container handlings, please provide a revised version of Table 8 that is developed using only data for non-identical containers.

b. To develop the figures in the column labeled "FY95 IOCS Platform Dist. Key" did you use the same method as witness Van-Ty-Smith is using to develop a distribution key for identified containers at the MODS platform cost pool? If not, please describe in detail the method you used to develop the figures in the column labeled "FY95 IOCS Platform Dist. Key."