

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

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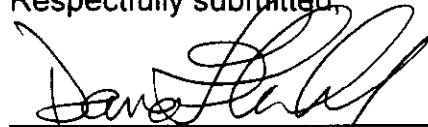
POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

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

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 Moeller: DMA/USPS-T28, Nos. 1-2. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,

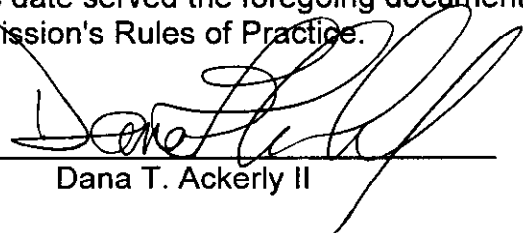


Dana T. Ackerly II, Esq.  
Neil K. Roman, Esq.  
Robert J. Lundman, Esq.  
COVINGTON & BURLING  
1201 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
(202) 662-5296

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: October 19, 2001

**INTERROGATORIES OF THE DIRECT MARKETING ASSOCIATION, INC.  
TO UNITED STATES POSTAL SERVICE WITNESS MOELLER**

**DMA/USPS-T28-1.** Please refer to Exhibit USPS-28B, where you show a cost coverage of 294.1 percent for Presort and Automation Letters and a cost coverage of 176.1 percent for Single-Piece Letters and Sealed Parcels.

(a) Please confirm that in previous Postal Rate Commission Opinion and Recommended Decisions, the Postal Rate Commission has not presented cost coverages at this level of detail. If not confirmed, please explain fully.

(b) Please provide the unit cost, unit revenue, and cost coverage individually for Presort and Automation Letters, and Single-Piece Letters and Sealed Parcels for the rates resulting from the Postal Service's Docket No. R2000-1 modification decision.

(c) Please provide the unit cost, unit revenue, and cost coverage individually for Presort and Automation Letters, and Single-Piece Letters and Sealed Parcels for the Commission's recommended Docket No. R2000-1 rates.

(d) Please provide the unit cost, unit revenue, and cost coverage individually for Presort and Automation Letters, and Single-Piece Letters and Sealed Parcels for the Commission's recommended Docket No. R97-1 rates.

(e) Please provide the unit cost, unit revenue, and cost coverage individually for Presort and Automation Letters, and Single-Piece Letters and Sealed Parcels for the Commission's recommended Docket No. R94-1 rates.

(f) Please provide the unit cost, unit revenue, and cost coverage individually for Presort and Automation Letters, and Single-Piece Letters and Sealed Parcels for the Commission's recommended Docket No. R90-1 rates.

(g) Please confirm that the Postal Service is projecting that the proportion of First-Class Letters comprised of Presort and Automation Letters will increase from 46.6 percent in FY 2000 to 52.3 percent in FY 2003. If not confirmed, please explain.

(h) Please confirm that, holding the cost coverages for Presort and Automation Letters, and Single-Piece Letters and Sealed Parcels at the levels shown in Exhibit USPS-28B, an increase in the proportion of First-Class Letters that are Presort and Automation Letters has the effect of increasing the cost coverage for First-Class Letters as a whole. If not confirmed, please explain fully.

(i) Please confirm that, ceteris paribus, had the proportion of First-Class Letters comprised of Presort and Automation Letters not increased between the Base

Year and the Test Year, the Test Year cost coverage for First-Class Letters would be lower.

**DMA/USPS-T28-2.** Please refer to Exhibit USPS-28B.

(a) Please provide Test Year volume variable costs individually for Standard Regular, Standard Nonprofit, Standard ECR, and Standard Nonprofit ECR.

(b) If you cannot provide the information requested in subpart (a) of this interrogatory, please explain in detail why you cannot provide this information.