

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

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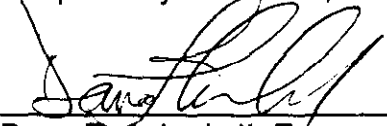
POSTAL RATE AND FEE CHANGES, 2001

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-T32, No. 1. 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: November 7, 2001

**INTERROGATORIES OF THE DIRECT MARKETING ASSOCIATION, INC.
TO UNITED STATES POSTAL SERVICE WITNESS MOELLER (USPS-T-32)**

DMA/USPS-T32-1. Please refer to page 19 of your testimony (USPS-T-32) where you state, "Specifically, the law [Public Law 106-384] requires that Nonprofit revenue-per-piece should be 60 percent of commercial revenue per piece." Please refer further to Exhibit USPS-28D where you show that the proposed rate increase for Standard Regular is 8.0%, the proposed rate increase for Standard Nonprofit is 6.7%, the proposed rate increase for Standard Enhanced Carrier Route is 6.2%, and the proposed rate increase for Standard Nonprofit Enhanced Carrier Route is 6.5%.

(a) Given the enactment of Public Law 106-384, please explain in as much detail as possible why the percentage rate increase for Standard Nonprofit is not the same as the percentage rate increase for the Standard Regular subclass.

(i) In particular, is the difference in rate increases between the two subclasses related to the migration of Basic ECR letters to the 5-Digit Automation rate category?

(ii) If so, please explain the relationship.

(b) Given the enactment of Public Law 106-384, please explain in as much detail as possible why the percentage rate increase for Standard Nonprofit Enhanced Carrier Route is not the same as the percentage rate increase for the Standard Enhanced Carrier Route subclass.

(i) In particular, is the difference in rate increases between the two subclasses related to the migration of Basic ECR letters to the 5-Digit Automation rate category?

(ii) If so, please explain the relationship.