

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

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POSTAL RATE COMMISSION
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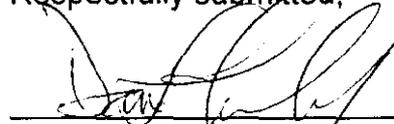
POSTAL RATE AND FEE CHANGES, 2001

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, No. 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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Counsel for the Direct Marketing
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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: November 7, 2001

**INTERROGATORIES OF THE DIRECT MARKETING ASSOCIATION, INC.
TO UNITED STATES POSTAL SERVICE WITNESS MOELLER (USPS-T-28)**

DMA/USPS-T28-3. On page 14 of your testimony in your discussion of the cost coverage for First-Class Mail Letters and Sealed Parcels, you state that "[a]t first blush, this cost coverage is higher than many traditional measures." By this statement, do you mean that the cost coverage for First-Class Mail Letters and Sealed Parcels as proposed by the Postal Service in this proceeding is higher than has been proposed by the Postal Service and approved by the Commission in omnibus rate proceedings in the recent past? If your answer is other than an unqualified "yes," please define what you mean by "traditional measures" and provide any data that supports your statement.