

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**DIRECT MARKETING ASSOCIATION, INC.'S SECOND SET OF
INTERROGATORIES DIRECTED TO USPS WITNESS BRADLEY
(DMA/USPS-T14, Nos. 15-18)**

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 Bradley: DMA/USPS-T14, Nos. 15-18. 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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WITNESS BRADLEY (USPS-T-14)

DMA/USPS-T14-15. Please refer to Library Reference H-146 and Library Reference H-148.

- a. Please confirm that the MODS codes which you define as belonging to the flat sorting machine MODS operation ("FSB") for your regression are only a subset of those which are assigned to witness Degen's flat sorting machine cost pool.
- b. If sub-part (a) is confirmed, please explain the reasons that you used only a subset of the MODS codes.
- c. Please describe all other cases where you use only a subset of the MODS codes assigned by witness Degen to the corresponding cost pool and explain the reasons for using only a subset.

DMA/USPS-T14-16. Please refer to data set VVDA1.DAT from Library Reference H-148.

- a. Please confirm that labor productivity, defined as total piece handlings ("TPH") per work hour, on an optical character reader ("OCR") for a given year (e.g., FY1988) can be derived from VVDA1.DAT through the following process:
 1. Sum the value of TOCR over all rows where the first two characters of FYAP are "88."
 2. Sum the value of HOCR over all rows where the first two characters of FYAP are "88."
 3. Divide the result of Step 1 by the result of step 2.
- b. If sub-part (a) is not confirmed, please explain how one can calculate OCR labor productivity for a given year (e.g., FY1988) more accurately from VVDA1.DAT or from any other source.
- c. Please confirm that the general process of summing TPH for a given year and operation and dividing this figure by the sum of work hours for that operation and year can be used to calculate labor productivity for any direct MODS operation for any given year.

DMA/USPS-T14-17. Please refer to data set VVDA1.DAT from Library Reference H-148.

- a. Please confirm that the labor productivity for sorting flats at a MODS facility for a given year (e.g., FY1988) can be derived from VVDA1.DAT through the following process:
 1. Create $TFLAT = TFSB + TMANF$.
 2. Sum TFLAT over all rows where the first two characters of FYAP are "88."
 3. Create $HFLAT = TFSB + TMANF$.
 4. Sum HFLAT over all rows where the first two characters of FYAP are "88."
 5. Divide TFLAT by HFLAT.
- b. If sub-part (a) is not confirmed, please explain how one can calculate flat sorting productivity for a given year (e.g., FY1988) more accurately from VVDA1.DAT or from any other source.
- c. Please confirm that the general process of summing TPH for a given year and shape and dividing this figure by the sum of work hours for that year and shape can be used to calculate labor productivity for MODS facilities for any shape for any given year.

DMA/USPS-T14-18. Please refer to data set BMC.DAT from Library Reference H-148.

- a. Please confirm that labor productivity on a sack sorting machine ("SSM") at a Bulk Mail Center ("BMC") in a given year (e.g., FY1989) can be derived from BMC.DAT through the following process:
 1. Sum the value of TSSM over all rows where the first two characters of FYAP are "89."
 2. Sum the value of HSSM over all rows where the first two characters of FYAP are "89."
 3. Divide the result of step 1 by the result of step 2.
- b. If sub-part (a) is not confirmed, please explain how one can calculate SSM productivity for a given year (e.g., FY1989) more accurately from BMC.DAT or from any other source.
- c. Please confirm that the general process of summing TPH for a given year and operation and dividing this figure by the sum of work hours for that year and operation can be used to calculate labor productivity for any direct BMC operation for any given year.

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.



Michael D. Bergman

Dated: August 8, 1997