

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

RECEIVED  
AUG 14 4 51 PM '97  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

\_\_\_\_\_  
POSTAL RATE AND FEE CHANGES, 1997  
\_\_\_\_\_

)  
)  
)  
Docket No. R97-1

THE DIRECT MARKETING ASSOCIATION, INC.'S FIRST SET OF  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
DIRECTED TO USPS WITNESS ALEXANDROVICH (DMA/USPS-T5-1-7)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached first set of interrogatories and requests for production of documents to USPS witness Alexandrovich (DMA/USPS-T5-1-7). 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.  
David L. Meyer  
Michael D. Bergman  
COVINGTON & BURLING  
1201 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
(202) 662-5296

Counsel for the Direct Marketing  
Association, Inc.

August 14, 1997

**Witness Alexandrovich (USPS-T-5)**

DMA/USPS-T5-1. Please refer to the personnel account "Penalty Overtime Pay" (no. 51104) from Table 1 of LR-H-1.

- a. What is meant by the term "penalty" in this account ?
- b. What types of costs are included in this account ?
- c. How do the costs included in this account differ from the costs included in the account "Overtime Pay" (no. 51103)?

DMA/USPS-T5-2. Please refer to the personnel accounts "FICA Voluntary" (no. 51219), "Thrift Savings - Voluntary" (no. 51227) and "Ret Fund-FERS-Voluntary" (no. 51215) listed in Table A-1 of LR-H-1.

- a. Please describe in what sense these costs are "voluntary."
- b. Do these accounts include voluntary payments made by employees?
- c. If your response to subpart b. is "yes," please confirm that these costs are not included in the account "Full Time Salaries" (no. 51101) or "Part Time & Casual Salaries" (no. 51102).

DMA/USPS-T5-3. Please refer to Table A-1, page A-2, of LR-H-1. Please explain the difference in costs included between the personnel accounts "Performance Award - PCES" (no. 51111) and "Merit Bonus Payments - EAS" (no. 51112) listed in that Table.

DMA/USPS-T5-4. Please refer to Table A-1, page A-2, of LR-H-1. According to that Table, the Clerks subaccount within Cost Segment 3 receives over \$105 million of the cost of the USPS/DOL rehabilitation program.

- a. Please confirm that these costs represent .77% of the total accrued cost for Clerks.
- b. Please confirm that for practically every other cost segment/component, the rehabilitation program represents less than .45% of total accrued cost. Please confirm also that the USPS/DOL rehabilitation program represents an average of .41% of the accrued costs for all cost segments.

- c. Please describe the forms of rehabilitation and the types of costs included within this account.
- d. Please explain the reasons that the accrued costs for this account for Clerks are significantly higher than for other crafts.

DMA/USPS-T5-5. Please refer to Table A-1 of LR-H-1 which lists several personnel accounts apparently relating to travel expenses, including "Advance Round Trip" (no. 51214), "Non-Training Travel" (no. 51401), "Non-Training Travel - Det Assign" (51403), "Personnel Travel - Foreign" (no. 51404), "Travel - Inter. Postal Congress" (no. 51405), "Travel - Board of Governors" (no. 56316), "Training Travel - Outside" (no. 51411), and "Training Travel - USPS" (no. 51413). Please describe the various types of costs that are included in these accounts. For example, do these accounts only include actual transportation expenses (e.g., plane tickets, rental car costs) or do they include as well the costs of an employee's time (i.e., wages)?

DMA/USPS-T5-6. Please refer to Table A-1 of LR-H-1.


- a. Do part-time and casual employees receive employment benefits in addition to salaries?
- b. If the response to sub-part a. is "yes," please describe the types and costs of the particular employment benefits received by these employees.

DMA/USPS-T5-7. Please refer to Table A-1 of LR-H-1.

- a. Please identify and produce the manuals or other documents that describe the types of costs included within the personnel accounts listed in Table A-1.
- b. Please list all other personnel accounts not listed in Table A-1 and identify and produce the manuals or other documents that provide a description of the types of costs included within those personnel accounts.
- c. If there are no manuals or other documents that describe the types of costs included within the personnel accounts referred to in subparts a. and b., please provide a description of the costs included within these accounts.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 (section 3001.12) of the Postal Rate Commission's Rules of Practice and Procedure and Rule 3 of the Commission's Special Rules of Practice in this proceeding.

  
Michael D. Bergman

August 14, 1997

**COVINGTON & BURLING**

1201 PENNSYLVANIA AVENUE, N. W.

P.O. BOX 7566

WASHINGTON, D.C. 20044-7566

(202) 662-6000

FACSIMILE (202) 662-6291

**MICHAEL D. BERGMAN**

DIRECT DIAL NUMBER

(202) 662-5411

DIRECT FACSIMILE NUMBER

(202) 778-5411

mdbergman@cov.com

LECONFIELD HOUSE

CURZON STREET

LONDON W1Y 8AS

ENGLAND

TELEPHONE 44-171-495-5695

FACSIMILE 44-171-495-3101

KUNSTLAAN 44 AVENUE DES ARTS

BRUSSELS 1040 BELGIUM

TELEPHONE 32-2-549-5230

FACSIMILE 32-2-502-1598

August 14, 1997

**BY HAND**

Docket Section  
Postal Rate Commission  
1333 H Street, N.W.  
Suite 300  
Washington, D.C. 20268

**Re: R97-1**

Dear Sir/Madam:

Pursuant to the alternative procedure for filing set forth in Special Rule of Practice 3, please accept for filing in the above-referenced docket the enclosed original and three copies of the Direct Marketing Association, Inc.'s First Set of Interrogatories and Requests for Production of Documents Directed to USPS Witness Alexandrovich (DMA/USPS-T5-1-7).

A disk containing this document in WordPerfect 5.1 format, Arial 12 font, is also enclosed.

Please date-stamp the enclosed extra copy of this document and return it with our waiting messenger.

Thank you very much.

Sincerely,



Michael D. Bergman

Enclosure

RECEIVED  
AUG 14 4 51 PM '97  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY