

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
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THE DIRECT MARKETING ASSOCIATION, INC.'S FIFTH SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO USPS WITNESS BRADLEY (DMA/USPS-T14-33-34)

Pursuant to Sections 25 and 26 of the Commission's
Rules of Practice, the Direct Marketing Association, Inc.
hereby submits the attached fifth set of interrogatories and
requests for production of documents to USPS witness Bradley
(DMA/USPS-T14-33-34). If the designated witness is unable to
respond to this 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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August 29, 1997

Witness Bradley (USPS-T-14)

DMA/USPS-T14-33. Please refer to your response to DMA/USPS-T14-2.

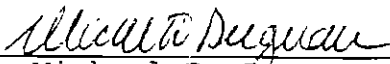
- a. Please confirm that casual or part time workers may be called to work when there is an unexpected increase in volume so that workhours for a given period accurately reflect the TPH for that period and there would be no reason to consider the volume from a previous period. If not confirmed, please explain fully.
- b. If current staffing is partially based on volume from the prior accounting period and TPH in the current period are fewer than the previous period so that some workers are idle, would the increase in workhours accurately reflect the volume of TPH from the current period? Please explain fully.
- c. Assume that TPH in the current period are fewer than in the previous period. Please explain how long it would take to readjust the number of workers during the current period to reflect the decreased number of actual piece handlings in the current time period? Please explain fully.

DMA/USPS-T14-34. Please refer to your response to DMA/USPS-T14-6.

- a. Please describe any source (either within or outside of the Postal Service) that describes the PIRS system.
- b. If your response to sub-part a. indicates that no such documentation is available, please provide a narrative description of the PIRS system (including, but not limited to, the role and training of the data collector, the types of mail processing and distribution activities that are recorded, the method in which such activities are recorded, the types of coding or tallies that are used to reflect activities, the frequency of recording activities, and the processes used to ensure the reliability of the data).

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 29, 1997