

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

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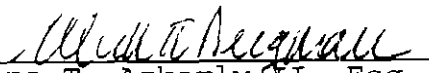
POSTAL RATE AND FEE CHANGES, 1997

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Docket No. R97-1

**THE DIRECT MARKETING ASSOCIATION, INC.'S SECOND SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS DIRECTED
TO USPS WITNESS CRUM (DMA/USPS-T28-10-18)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached second set of interrogatories and requests for production of documents to USPS witness Crum (DMA/USPS-T28-10-18). 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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September 2, 1997

Witness Crum (USPS-T-28)

DMA/USPS-T28-10. Please provide the number of direct mail tallies for Standard (A) nonletter, nonflat pieces individually for each subclass and each year from 1990-1996.

DMA/USPS-T28-11. For each Standard (A) nonletter, nonflat piece direct mail tally from 1990-1996, please provide the responses to Codes Questions 18 A-G and 19.

DMA/USPS-T28-12. Ignoring mail characteristics related to depth of sort, depth of entry, and weight, are there characteristics of nonletter, nonflat pieces that would result in lower than average mail processing costs? Please respond in as much detail as possible.

- a. All else being equal, should the cost of processing a machinable nonletter, nonflat piece be lower than the cost of processing a nonmachinable nonletter, nonflat piece? Please explain your response fully.
- b. All else being equal, should the cost of processing a small (in volume) machinable nonletter, nonflat piece be lower than the cost of processing a large (in volume) machinable nonletter, nonflat piece? Please explain your response fully.
- c. All else being equal, should the cost of processing a sturdy machinable nonletter, nonflat piece be lower than the cost of processing a similar piece that is not sturdy? Please explain your response fully.

DMA/USPS-T28-13. Please confirm that the analysis presented in your direct testimony does not rule out the possibility that an individual nonletter, nonflat piece in a specific rate category could have the same unit attributable cost as all flats in that rate category.

DMA/USPS-T28-14. Please confirm that the analysis presented in your testimony does not rule out the possibility that a specific type of nonletter, nonflat pieces in a specific rate category could have the same unit attributable cost as all flats in that rate category.

DMA/USPS-T28-15. Please refer to page 11, line 10, of your direct testimony where you state that "[s]everal studies supply additional data as necessary." Please summarize and produce (as a library reference) the studies to which you referred.

DMA/USPS-T28-16. Please confirm that, other than the study filed as LR-PCR-50 in MC97-2 and the studies referenced in your direct

testimony in R97-1 regarding weight, depth of sort and depth of entry, the Postal Service has not performed any studies of the cost-causing characteristics of nonletter, nonflat pieces. If not confirmed, please summarize and produce (as a library reference) such studies.

DMA/USPS-T28-17. Please refer to page 11, lines 16-17, of your direct testimony in which you state that you "combine[d] Regular and Enhanced Carrier Route as well as Regular Rate and Nonprofit costs and volumes" for your analysis. Please clarify what types of mail are included in your "Regular Rate" category if different than Standard (A) Regular mail.

DMA/USPS-T28-18. Please refer to your response to DMA/USPS-T28-4. Please provide the percentage of mailing statements that were "corrected upon verification" and the reasons that such statements were corrected.

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

September 2, 1997