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

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

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) Docket No. R97-1
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**THE DIRECT MARKETING ASSOCIATION, INC.'S FOURTH SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO USPS WITNESS MODEN (DMA/USPS-T4-39-42)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached fourth set of interrogatories and requests for production of documents to USPS witness Moden (DMA/USPS-T4-39-42). 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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September 3, 1997

Witness Moden (USPS-T-4)

DMA/USPS-T4-39. Please refer to your response to DMA/USPS-T4-16.

- a. Please confirm that the term "assignments" as used in your response refers to the carriers assigned to and working out of the zone in question.
- b. Please confirm that a reduction in assignments from 10 to 9, means that the number of carriers assigned to and working out of the zone in question has been reduced by one individual.
- c. Is it universally the case throughout the Postal Service that city delivery carriers are full-time employees? Please explain any "no" answer fully and quantify the extent, if any, that other types of employees perform city delivery carrier functions.
- d. Please confirm that the term "complement" as used in your responses refers to the total number of city delivery carriers assigned to and working out of a particular zone.
- e. Please confirm that a "reduction of assignments" would "result in a reduction of complement."
- f. Please list all the ways in which a zone might be able to "realize savings" in areas other than reduction of complement or reduction in overtime usage.

DMA/USPS-T4-40. Please refer to your response to DMA/USPS-T4-16b.

- a. Do the operating budgets for 5-digit ZIP code offices contain amounts planned to be spent on city delivery carrier overtime costs? Please explain fully.
- b. Is it relatively rare or relatively common for the operating budget of a 5-digit ZIP code office to contain the budget authority referred to sub-part a.? Is there a special process through which such authority is approved, as distinct from the process through which other amounts of budget authority are approved? Please describe in detail the process through which the amount of any such budget authority is determined.
- c. If such amounts of budget authority are other than extremely rare, please describe generally the size of the typical overtime budget authority and the factors utilized in determining its size.

- d. Please describe as completely as possible the relevance, if any, in this budget process of mail mix. For example, do the relative amounts of mail of various classes play a role in determining the amounts, if any, budgeted for overtime for city delivery carriers?

DMA/USPS-T4-41. Please refer to your testimony at page 9, lines 25 through 26, where you state, "some zones with fewer than 10 routes may also receive DPS as a result of local decisions." Please refer, also, to your answer to DMA/USPS-T4-16c.

- a. Please describe in as much detail as possible the factors (other than machine availability) that could justify DPS for zones with fewer than 10 routes.
- b. Is there a subset of zones with fewer than 10 routes the characteristics of which would make it beneficial to provide them with DPS? If so, please describe this subset and its characteristics. Please explain fully.
- c. Is either (i) budgeted city delivery carrier overtime or (ii) actual city delivery carrier overtime expenses a characteristic that would indicate that DPS would be beneficial for a given zone? If so, please describe as fully as possible the ways in which DPS could reduce overtime expenses (or any other expenses) in such a zone.
- d. How many 5-digit ZIP code offices have ten or more carriers? How many carriers work out of such offices? How many 5-digit ZIP code offices have fewer than ten carriers? How many carriers work out of such offices? In providing your answers, please distinguish between city delivery carriers and rural carriers.

DMA/USPS-T4-42. Please refer to your response to DMA/USPS-T4-21a, where you state that "during the most recent five day period, ending August 28, 1997, the cumulative average curtailment per city route for the period was 9.51 feet."

- a. Please describe the "9.51 feet" figure in more detail. For example, (i) does "feet" measure the height of a stack of this mail, if this mail were stacked vertically? (ii) Does "cumulative" mean that the amount of mail curtailed each day is added for the five most recent days? (iii) Does the Postal Service track curtailment using a "rolling" five-day figure or is curtailment measured for discrete five-day periods? (iv) If the figure is not calculated on a "rolling" basis, please describe the reasons for choosing a five-day period, as contrasted to a seven-day, or a one-day period, or some other period.
- b. What percentage of the average carrier's capacity does the "9.51 feet" figure represent? What is the average capacity of a city carrier? If there is some

variation in the capacity of various city routes, please describe in as much detail as possible the range of city carrier capacity.

- c. Please provide the cumulative average curtailment per city route for each period of time for which this data was collected over the most recent twelve-month period.
- d. Is there a limit to the extent to which non-preferential mail may be curtailed (e.g., a particular cumulative average curtailment per city route in linear feet) above which additional workers or overtime will be used to process such mail? If "yes," please explain fully.

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 3, 1997