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

Postal Rate and Fee Changes, 2001	Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
TO INTERROGATORY OF DIRECT MARKETING ASSOCIATION
(DMA/USPS-T28-3)

The United States Postal Service hereby files the response of witness

Moeller to the following interrogatory of Direct Marketing Association, that was

filed on November 7, 2001: DMA/USPS-T28-3.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel
Ratemaking

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Attorney

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November 21, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MOELLER TO
INTERROGATORIES OF DIRECT MARKETING ASSOCIATION

DMA/USPS-T28-3.   On page 14 of your testimony in your discussion of
the cost coverage for First-Class Mail Letters and Sealed Parcels, you state that
"[a]t first blush, this cost coverage is higher than many traditional measures." By
this statement, do you mean that the cost coverage for First-Class Mail Letters
and Sealed Parcels as proposed by the Postal Service in this proceeding is
higher than has been proposed by the Postal Service and approved by the
Commission in omnibus rate proceedings in the recent past? If your answer is
other than an unqualified "yes," please define what you mean by "traditional
measures" and provide any data that supports your statement.

RESPONSE:

Yes. The numerical figure itself is higher than those proposed or recommended

in recent omnibus rate proceedings.

CERTIFICATE OF SERVICE

       I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in Docket No. R2001-1.

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