

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

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS BRADLEY TO INTERROGATORY OF  
THE DIRECT MARKETING ASSOCIATION, INC.  
(DMA/USPS-T14-32)

The United States Postal Service hereby provides the response of witness Bradley to the following interrogatory of the Direct Marketing Association, Inc.: DMA/USPS-T14-32, filed on August 27, 1997.

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

  
Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2992; Fax -5402  
September 9, 1997

Response of United States Postal Service Witness Bradley  
to  
Interrogatories of DMA

DMA/USPS-T14-32. Using the same time period as was applied in LR-H-148, VVDA1.DATA and VVDA2.DATA, please provide total workhours and total piece handlings for MODS facilities and BMCs by operation for each day within each A/P and for each hour interval within each day. Please provide the data in a format similar to that used in LR-H-148, VVDA1.DATA and VVDA2.DATA. If you cannot provide total piece handlings in this format, please provide total workhour data.

DMA/USPS-T14-32 Response:

No such detailed data exist that would permit construction of the data set you request. Incidentally, by my calculation the requested data set would have over 160 million observations for the MODS direct activities alone.

**DECLARATION**

I, Michael D. Bradley, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in cursive script, reading "Michael D. Bradley". The signature is written in black ink and is positioned to the right of the declaration text.

Dated: Sept. 2, 1997

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



\_\_\_\_\_  
Eric P. Koetting

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