

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 THIRD SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO USPS WITNESS MOELLER (DMA/USPS-T36-9-10)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached third set of interrogatories and requests for production of documents to USPS witness Moeller (DMA/USPS-T36-9-10). If the designated witness is unable to respond to this interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



Dana T. Ackerly II, Esq.
David L. Meyer
Michael D. Bergman
COVINGTON & BURLING
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 662-5296

Counsel for the Direct Marketing
Association, Inc.

September 12, 1997

Witness Moeller (USPS-T-36)

DMA/USPS-T36-9. Please refer to your response to NAA/USPS-T36-5(d) in which you state that "A piece with "flat-like" costs will likely meet the definition of a flat, in which case it would be exempted from the surcharge, as long as it is prepared in accordance with flat preparation requirements."

- (a) Please describe the flat preparation requirements you cite.
- (b) Does this answer imply that the Postal Service has performed studies which show that shape is the factor that differentiates the costs of flats from those of nonflats? If so, please provide a copy of the relevant study or studies.

DMA/USPS-T36-10. Please refer to your response to DMA/UPS-T4-23(b) (redirected from witness Moden).

- (a) Please confirm that the Postal Service realizes similar cost savings from prebarcoded Standard (A) parcels as with prebarcoded Standard (B) parcels.
- (b) Please confirm that one of the reasons that no discount was proposed for prebarcoded Standard (A) parcels is because the discount would make the rate structure for Standard (A) less "simple."
- (c) Please describe the number of rate categories that already exist in Standard (A) mail.

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 12, 1997