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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY


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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 ALEXANDROVICH (DMA/USPS-T5-8-9)

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 Alexandrovich (DMA/USPS-T5-8-9). 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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Counsel for the Direct Marketing  
Association, Inc.

September 12, 1997

**Witness Alexandrovich (USPS-T-5)**

DMA/USPS-T5-8. Please refer to your response to DMA/USPS-T4-30 in which you confirm that "the deferability of nonpref mail lowers peak load costs." Please describe and provide all data detailing the extent of peak load costs which are reduced due to the deferability of (i) nonpref mail, in general and (ii) Standard A mail, in particular.

DMA/USPS-T5-9. Please refer to your responses to DMA/USPS-T4-28 and DMA/USPS-T4-33. Please confirm that the Postal Service has not conducted any studies since the R87-1 filing analyzing mail processing marginal cost differences between pref and nonpref mail. If not confirmed, 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.

  
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Michael D. Bergman

September 12, 1997