

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 THIRD SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO USPS WITNESS DEGEN (DMA/USPS-T12-9)

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 Degen (DMA/USPS-T12-9). If the designated witness is unable to respond to this interrogatory, we request a response by some other qualified witness.

Respectfully submitted,


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September 12, 1997

Witness Degen (USPS-T-12)

DMA/USPS-T12-9. Please refer to your response to OCA/USPS-T-12-38(e) in which you state that "since the MODS data on Postal Service mainframes are periodically revised or corrected, the data filed in LR-H-248 is close, but not exactly identical, to that which was used to generate the hard copy summary in LR-H-146, part 1."

- (a) Please provide a thorough explanation of why the MODS data are revised or corrected. Please explain
 - (i) what kinds of errors are corrected or revised,
 - (ii) what kinds of errors are not corrected or revised,
 - (iii) how the faulty data are detected, and
 - (iv) how often revisions are made (e.g., each AP, as necessary, twice a year, etc.).
- (b) What percentage of the data elements have changed since the compilation of the data in LR-H-146, part 1, and the creation of the CD-ROM.
- (c) Is the Postal Service considering making subsequent changes to the data? If so, under what circumstances would such changes occur?

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