

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

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Docket No. R97-1

**THE DIRECT MARKETING ASSOCIATION, INC.'S FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO USPS WITNESS WADE (DMA/USPS-T20-1-2)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached first set of interrogatories and requests for production of documents to USPS witness Wade (DMA/USPS-T20-1-2). 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 15, 1997

Witness Wade (USPS-T-20)

DMA/USPS-T20-1. Please refer to LR-H-150, Spreadsheet DATA_SUM.XLS, Worksheet Survey Data, Column ED.

- a. Please explain how you know definitively that the capacity of an "Other" truck is the same as a "2T" truck? Please explain fully.
- b. Please confirm that the capacity of a "7/9" truck is the same as the capacity of a "9T" truck.
- c. Please confirm that 7/9 is an abbreviation for a 7/9 Ton truck.

DMA/USPS-T20-2. Please refer to LR-H-150, Spreadsheet DATA_SUM.XLS, Worksheet Survey Data, Column FV.

- a. Please confirm that the value of COMPLOAD for facilities that were used in your regression varies from 13.2 percent to 100 percent.
- b. Is it likely that the average capacity utilization for a truck type and trip type at a facility for a full year for a truck when it leaves its origin facility would be 13.2 percent? Please explain fully.
- c. Is it likely that the capacity utilization for a trip type and truck type at one facility averaged over all stops for a full year would be 100 percent? 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.



Michael D. Bergman

September 15, 1997