

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

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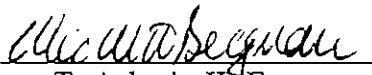
POSTAL RATE AND FEE CHANGES, 1997

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Docket No. R97-1

**THE DIRECT MARKETING ASSOCIATION, INC.'S SIXTH SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO USPS WITNESS MODEN (DMA/USPS-T4-55-62)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached sixth set of interrogatories and requests for production of documents to USPS witness Moden (DMA/USPS-T4-55-62). 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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September 15, 1997

Witness Moden (USPS-T-4)

DMA/USPS-T4-55. Has the Postal Service ever performed studies to determine the regional, seasonal, or temporal variations in MODs conversion factors? If so, please provide the results of these studies, indicate when they were performed, and produce them as library references.

DMA/USPS-T4-56. (a) When was MODs implemented?

(b) Was its predecessor system the Workload Recording System ("WLRs")?

DMA/USPS-T4-57. Has the Postal Service ever testified in a proceeding or proceedings before the Postal Rate Commission on the suitability of MODs as a costing system? If so, please provide all citations to such testimony.

DMA/USPS-T4-58. Has the Postal Service ever used MODs data as the basis of a distribution key in a proceeding before the Postal Rate Commission? If so, please provide all such citations to such testimony.

DMA/USPS-T4-59. (a) Has the Postal Service ever rebutted intervenors' attempts to use MODs data in a cost analysis in testimony before the Postal Rate Commission?

(b) If the response to subpart (a) is "yes," please explain why the Postal Service rebutted such attempts and provide citations to all such testimony.

DMA/USPS-T4-60. (a) What organization within the Postal Service is responsible for maintaining MODs?

(b) When did the organization identified in subpart (a) become responsible for maintaining MODs?

(c) Which organization with the Postal Service was responsible for maintaining MODS before the organization identified in subpart (a)?

DMA/USPS-T4-61. Please describe and provide copies of all national reports produced by MODs. Please also describe the purpose of each report, its distribution, the frequency of production, and the date of inception of the report.

DMA/USPS-T4-62. (a) In MODs offices, does an individual's clocked MODs hours provide the basis for paying that individual?

- (b) If the response to subpart (a) is "no," what data system is used for determining the hours worked by an employee?
- (c) If an employee's hours are revised from what is clocked into MODs during the course of a pay period or after a per period, are the hours by operation also changed in the MODs data?
- (d) If your response to subpart (c) is "yes," please explain whether changes in hours of operation have always occurred when an employee's hours were changed.
- (e) If your response to subpart (d) is "no," when was the change in operation hours made?

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