

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 FIRST SET OF  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
DIRECTED TO USPS WITNESS BERNSTEIN (DMA/USPS-T31-1-2)**

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 Bernstein (DMA/USPS-T31-1-2). 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 15, 1997

**Witness Bernstein (USPS-T-31)**

DMA/USPS-T31-1. Please refer to Table 11 on page 55 of your direct testimony, Exhibit USPS-30B, and Exhibit USPS-30G.

- a. Please confirm that if the Postal Service used the R97-1 After-Rates Ramsey Prices shown in Table 11 of your testimony, then: (1) the markup on Standard A Commercial mail (excluding Single-Piece mail) would be 56.6 percent, (2) the volume of Standard A Commercial mail (excluding Single-Piece mail) would be 74.7 billion, (3) the cost of Standard A Commercial mail (excluding Single-Piece mail) would be \$7.502 billion, and (4) the revenue from Standard A Commercial mail (excluding Single-Piece mail) would be \$11.749 billion.
- b. Please confirm the following Test Year After Rates statistics under the USPS-proposed rates: (1) USPS-proposed markup on Standard A Commercial mail is 74.1 percent, (2) Standard A Commercial volume is 66.3 billion pieces, (3) Standard A Commercial cost is \$7.078 billion, and (4) Standard A Commercial revenue is \$12.326 billion.
- c. Please confirm that, under R97-1 After-Rates Ramsey Prices, Standard A Commercial Test Year After Rates volume would be approximately eight billion pieces higher than under the USPS-proposed rates.
- d. Please confirm that, under R97-1 After-Rates Ramsey Prices, Standard A Commercial Test Year After Rate revenue would be approximately \$400 million lower than under the USPS-proposed rates.

DMA/USPS-T31-2. Please refer to Table 13 on page 70 of your direct testimony.

- a. Please confirm that moving from Non-Ramsey prices to Ramsey prices increases consumer surplus by \$1.023 billion.
- b. Please confirm that moving from Non-Ramsey prices to Ramsey prices for the Standard A Commercial subclasses (excluding the Single-Piece Subclass) increases consumer surplus by \$752 million.
- c. Are the Non-Ramsey prices shown in Table 13 based upon the R97-1 USPS-proposed rates or are they R97-1 After-Rates Prices Based on R94-1 Markup Index?
- d. If the Non-Ramsey prices shown in Table 13 are not developed from R97-1 USPS-proposed rates, please provide a revision of Table 13 which uses R97-1 USPS-proposed rates to develop the figures in the "Non-Ramsey Prices" column.

## 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