

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 FOURTH SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS DIRECTED
TO USPS WITNESS DEGEN (DMA/USPS-T12-10-11)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached fourth set of interrogatories and requests for production of documents to USPS witness Degen (DMA/USPS-T12-10-11). 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 16, 1997

Witness Degen (USPS-T-12)

DMA/USPS-T12-10. Please refer to your response to DMA/USPS-T12-3 (b) where you state, "I believe that the MODS activity at the operation group level and the employee's activity are consistent in the vast majority of cases."

- a. Please confirm that you have performed no quantitative analysis to support your belief that the MODS activity at the operation group level and the employee's activity are consistent in the vast majority of cases.
- b. If subpart a is not confirmed, please summarize the results of your analysis and provide a copy.

DMA/USPS-T12-11. Please refer to your response to NAA/USPS-T12-2, Attachment 1, Page 2. Footnote 2, which is placed next to the Cost Pool Non-MODS, states, "Includes break/personal needs (activity code 6521) tallies."

- a. Since this footnote is only placed next to the Non-MODS cost pool, does this imply that the other cost pools do not include breaks/personal needs tallies?
- b. Please confirm that all cost pools include some costs for break/personal needs. If not confirmed, please explain fully.
- c. Please confirm that the "Not Handling" mail tally figures detailed in Attachment 1 include all costs within IOCS activity code 6523.

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 16, 1997