

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

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DEGEN TO INTERROGATORIES OF
THE DIRECT MARKETING ASSOCIATION, INC.
REDIRECTED FROM WITNESS CRUM
(DMA/USPS-T28-10 - 11)

The United States Postal Service hereby provides responses of witness Degen to the following interrogatories of the Direct Marketing Association, Inc.: DMA/USPS-T28-10 - 11, filed on September 2, 1997, and redirected from witness Crum.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Eric P. Koetting

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(202) 268-2992; Fax -5402
September 16, 1997

**Response of United States Postal Service Witness Degen
to Interrogatories of the Direct Marketing Association, Inc.
(Redirected from Witness Crum)**

DMA/USPS-T28-10. Please provide the number of direct mail tallies for Standard (A) nonletter, nonflat pieces individually for each subclass and each year from 1990-1996.

DMA/USPS-T28-10 Response.

Please see Attachment 1 to this response for the requested data.

Attachment 1, Response to DMA/USPS-T28-10

Number of IOCS Tallies by Fiscal Year for Bulk Third-Class IPP and Parcel Direct Activity Codes

Activity Code	FY80	FY91	FY92	FY93	FY94	FY95	FY96
3310	90	195	295	165	132	128	130
3330	5	2	5	2	5	2	6
3340	1,018	942	933	454	451	524	801
3350	77	74	63	51	44	47	80
4310	35	32	33	20	27	19	14
4330	2	1	3	1	7	-	-
4340	1,733	1,722	1,797	725	643	671	707
4350	75	73	60	32	24	20	22

Summary by Subclass

Subclass	FY90	FY91	FY92	FY93	FY94	FY95	FY96	
Bulk Regular Carrier Route	125	227	328	185	159	147	144	= 3310 + 4310
Bulk Regular Other	2,751	2,664	2,730	1,179	1,094	1,195	1,508	= 3340 + 4340
Nonprofit Carrier Route	7	3	8	3	12	2	6	= 3330 + 4330
Nonprofit Other	152	147	123	83	68	67	102	= 3350 + 4350

**Response of United States Postal Service Witness Degen
to Interrogatories of the Direct Marketing Association, Inc.
(Redirected from Witness Crum)**

DMA/USPS-T28-11. For each Standard (A) nonletter, nonflat piece direct mail tally from 1990-1996, please provide the responses to Codes Questions 18 A-G and 19.

DMA/USPS-T28-11 Response.

The requested data will be filed in machine-readable form as library reference H-262.

DECLARATION

I, Carl G. Degen, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

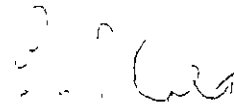


Carl G. Degen

Date: 7-16-17

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Eric P. Koetting

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