

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 THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DIRECT MARKETING ASSOCIATION
AND MOTION FOR LATE ACCEPTANCE
(DMA/USPS-T30-6)**

The United States Postal Service hereby files its response to the following interrogatory of Direct Marketing Association, dated July 29, 1997: DMA/USPS-T30-6.

The interrogatory has been redirected to the Postal Service for response.

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

Production of the answer, due August 12, 1997, required a comprehensive search of records in the Marketing Department. The search was initially delayed until critical personnel (who were temporarily out-of-town) returned to Headquarters so that they could be brought in to manage and conduct the search. Those persons then had to conduct the search while managing other equally pressing responsibilities.

Numerous documents had to be examined in order to determine which, if any might be responsive. Consultations with very patient DMA counsel helped to clarify the scope of the search, resulting in the production of the response being filed today, and the offer of access to responsive electronic files.

The Postal Service regrets that it took as long as it did to respond to this interrogatory, but trusts that this situation will be regarded as anomalous.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

A handwritten signature in cursive script, appearing to read "M. Tidwell", written over a horizontal line.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202)268-2998/FAX: -5402
September 19, 1997

**RESPONSE OF U.S. POSTAL SERVICE WITNESS O'HARA TO
INTERROGATORIES OF THE DIRECT MARKETING ASSOCIATION, INC.**

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE DIRECT MARKETING ASSOCIATION
REDIRECTED FROM WITNESS O'HARA**

DMA/USPS-T30-6. Please refer to your testimony at page 33, lines 13-18, in which you discuss the availability of alternatives (criterion 5) and where you state, "the Regular subclass is somewhat more suited to demographic targeting of commercial messages and the Enhanced Carrier Route subclass is somewhat more suited to geographic targeting. For this reason, the availability of alternatives (criterion 5) is somewhat less for Regular, but a number of alternatives for demographically targeted advertising exists, including special-interest magazines, cable television channels, and internet websites."

- a. Please identify all documents available to the Postal Service detailing the extent of the "alternatives for demographically targeted advertising." Please summarize the conclusions of any such documents and provide them as library references.
- b. Please identify all documents available to the Postal Service detailing the extent of the "alternatives for geographically targeted advertising." Please summarize the conclusions of any such documents and provide them as library references.

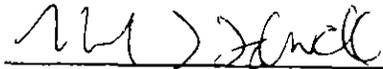
RESPONSE:

The following documents have been identified in response to this request: the 1995 Household Diary Study and the 1992 USPS Nonhousehold Survey.

The former is on file as USPS Library Reference H-162. The latter does not exist in hard-copy form, but can be accessed through a database at USPS Headquarters. Arrangements to examine it can be made through Postal Service counsel.

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 section 12 of the Rules of Practice.



Michael T. Tidwell

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September 19, 1997