

DOCKET SECTION

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
TO INTERROGATORIES OF
THE DIRECT MARKETING ASSOCIATION, INC.
REDIRECTED FROM WITNESS MODEN
(DMA/USPS-T4-47 & 50)

The United States Postal Service hereby provides responses to the following interrogatories of the Direct Marketing Association, Inc.: DMA/USPS-T4-47 & 50, filed on September 12, 1997, and redirected from witness Moden.

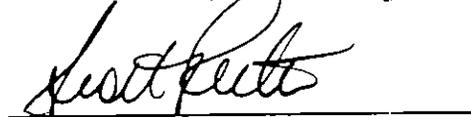
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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September 26, 1997

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO THE INTERROGATORIES OF THE DIRECT MARKETING ASSOCIATION
REIRECTED FROM WITNESS MODEN**

DMA/USPS-T4-47. Please refer to your response to DMA/USPS-T4-38. For years, the Postal Service has maintained that the In-Office Cost System (IOCS) determines the percentages of time craft employees spend on the various classes and subclasses of mail.

- a. Please explain how the IOCS may be used to provide information on the relative percentages of mail processed.
- b. Please explain whether the IOCS has been recently modified to count pieces.

Response:

- a. As indicated by the Postal Service in previous years, IOCS can not provide information on the volumes of mail, or relative percentage of mail, by class or subclass for processing on automated equipment, mechanized equipment or manually. Please see witness Moden's revised response to DMA/USPS-T4-38.
- b. See the response to subpart a.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS MODEN
TO THE INTERROGATORIES OF THE DIRECT MARKETING ASSOCIATION**

DMA/USPS-T4-50. Please provide the amounts and percentages, for the past three and next three fiscal years, of Standard A mail (i) letters, (ii) flats, and (iii) parcels that are machinable. For each shape, please disaggregate the machinable items by the actual processing machine (e.g., the percentage of flats that are processed on an FSM 881, the percentage that are processed on an FSM 1000, etc.).

Response:

The percentage of machinable letters for automation equipment is provided in the testimony of witness Daniel, USPS-T-29, Appendix 1, page 37 for Regular and Appendix 3, page 37 for Nonprofit.

The percentage of machinable flats for FSM 881s is provided in the response of the Postal Service to TW/USPS-2.

Information on the machinability of parcels is provided in Table C-2 of LR-PCR-38 from Docket No. MC97-2.

Apart from these estimates there are no year by year estimates of machinability (e.g. for the past three and next three fiscal years) as requested.

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.



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