

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

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MODEN TO INTERROGATORY OF
THE DIRECT MARKETING ASSOCIATION, INC.
(DMA/USPS-T4-28(B))

The United States Postal Service hereby provides the revised response of witness Moden to interrogatory DMA/USPS-T4-28(b), originally filed on September 9, 1997. A replacement page is attached. The change is being made because additional material responsive to the question was found subsequent to the filing of the original answer. That material is being filed as a library reference today, as indicated in the revised response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

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September 26, 1997

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

DMA/USPS-T4-28. Please identify, describe and produce all studies or reports conducted since 1988 by the USPS concerning:

- a. the general nature and quantification of mail processing peak load and premium pay costs and the attribution of such costs to mail classes, including:
 - i) whether specific amounts of premium pay costs can be causally related to particular classes of mail.
 - ii) whether specific amounts of overtime costs are causally related to particular classes of mail.
 - iii) whether mail processing capacity is less or greater than demand at particular time intervals, both for total demand and pref mail demand.
- b. the flexibility of mail processing labor capacity, including the use and flexibility of both regular and supplemental staff (including Part Time Flexible employees) and limitations on labor flexibility such as advance notice requirements, restrictions on the use of supplemental labor and limits on overtime (whether due to collective bargaining agreements or otherwise).
- c. mail deferral patterns, including the frequency, length and extent of mail deferral by class and the reasons for such deferral.
- d. mail arrival patterns, including fluctuations in arriving mail volumes by sub-class, by hour, Tour, day, week and AP.
- e. the relationship between mail arrival rates, peak processing requirements and staffing patterns (including staff levels and composition).
- f. the relative productivities of manual, mechanized and automated processing and how such productivity varies with fluctuating mail volumes.

Response:

- a. Redirected to witness Alexandrovich.
- b. Material responsive to this question has been filed as Library References H-255 and H-283.

DECLARATION

I, Ralph J. Moden, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.

Ralph J. Moden

Dated: 9/26/97

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.



Scott L. Reiter

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