

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MODEN TO INTERROGATORIES OF
THE DIRECT MARKETING ASSOCIATION, INC.
(DMA/USPS-T4-55, 56, 60-62)

The United States Postal Service hereby provides responses of witness Moden to the following interrogatories of the Direct Marketing Association, Inc.: DMA/USPS-T4-55, 56, 60-62, filed on September 15, 1997. An objection to interrogatories DMA/USPS-T4-57 and 59 was filed on September 25, 1997. Interrogatory DMA/USPS-T4-58 was redirected to the Postal Service.

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, Rate-making



Scott L. Reiter

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September 29, 1997

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO THE INTERROGATORIES OF THE DMA**

DMA/USPS-T4-55. Has the Postal Service ever performed studies to determine the regional, seasonal, or temporal variations in MODs conversion factors? If so, please provide the results of these studies, indicate when they were performed, and produce them as library references.

Response:

I am not aware of any such studies.

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DMA/USPS-T4-56. (a) When was MODs implemented?

(b) Was its predecessor system the Workload Recording System ("WLRS")?

Response:

a. I am told it was 1973.

b. Yes.

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DMA/USPS-T4-60. (a) What organization within the Postal Service is responsible for maintaining MODs?

(b) When did the organization identified in subpart (a) become responsible for maintaining MODs?

(c) Which organization within the Postal Service was responsible for maintaining MODS before the organization identified in subpart (a)?

Response:

- a. Operations Support
- b. It has always been Operations Support, although the responsible subgroup within Operations Support has changed with successive reorganizations.
- c. n/a

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TO THE INTERROGATORIES OF THE DMA**

DMA/USPS-T4-61. Please describe and provide copies of all national reports produced by MODs. Please also describe the purpose of each report, its distribution, the frequency of production, and the date of inception of the report.

Response:

The MODS system itself does not produce any national reports. Instead, national reporting of MODS data is accomplished through MODS subsystems within the Corporate Information System (CIS) and Executive Information System (EIS). These subsystems provide an elaborate set of options to select the desired data elements, time periods, operations, geographic areas, type of report, etc. The requested report is generated on demand based on the selected options.

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DMA/USPS-T4-62. (a) In MODs offices, does an individual's clocked MODs hours provide the basis for paying that individual?

(b) If the response to subpart (a) is "no," what data system is used for determining the hours worked by an employee?

(c) If an employee's hours are revised from what is clocked into MODs during the course of a pay period or after a pay period, are the hours by operation also changed in the MODs data?

(d) If your response to subpart (c) is "yes," please explain whether changes in hours of operation have always occurred when an employee's hours were changed.

(e) If your response to subpart (d) is "no," when was the change in operation hours made?

Response:

a. Yes.

b. n/a

c. Yes.

d. It is my understanding that this has always been the policy. Of course, on occasion the responsible personnel may forget to make the change.

e. n/a.

DECLARATION

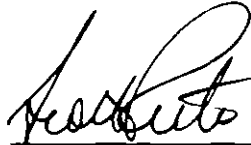
I, Ralph J. Moden, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.

Ralph J. Moden

Dated: 9/23/97

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.

A handwritten signature in black ink, appearing to read "Scott L. Reiter", is written over a horizontal line.

Scott L. Reiter

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