

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 INTERROGATORY OF
THE DIRECT MARKETING ASSOCIATION, INC.
REDIRECTED FROM WITNESS MODEN
(DMA/USPS-T4-58)

The United States Postal Service hereby provides the response to the following interrogatory of the Direct Marketing Association, Inc.: DMA/USPS-T4-58, filed on September 15, 1997, and redirected from witness Moden.

The 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



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September 29, 1997

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DMA
(REDIRECTED FROM WITNESS MODEN)

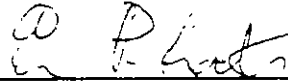
DMA/USPS-T4-58. Has the Postal Service ever used MODS data as the basis of a distribution key in a proceeding before the Postal Rate Commission? If so, please provide all such citations to such testimony.

RESPONSE:

MODS data do not include information by subclass of mail. Therefore, MODS data cannot be used as the basis of a distribution key, and the Postal Service has not done so in this or any other proceeding.

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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