

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
WITNESS DANIEL TO INTERROGATORY OF
THE DIRECT MARKETING ASSOCIATION, INC.
(DMA/USPS-T29-2)

The United States Postal Service hereby provides the response of witness Daniel to the following interrogatory of the Direct Marketing Association, Inc.: DMA/USPS-T29-2, filed on September 24, 1997.

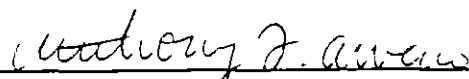
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anthony F. Alverno

475 L'Enfant Plaza West, S.W.
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(202) 268-2997; Fax -5402
October 8, 1997

**RESPONSE OF U.S. POSTAL SERVICE WITNESS DANIEL TO
INTERROGATORY OF DIRECT MARKETING ASSOCIATION**

DMA/USPS-T29-2. Please refer to your response to DMA/USPS-T29-2.


- a. What percentage of Standard A parcels is sorted at BMCs?
- b. What percentage of Standard A machinable parcels is sorted at BMCs?
- c. What percentage of Standard A prebarcoded parcels is sorted at BMCs?
- d. What percentage of Standard B parcels is sorted at BMCs?
- e. What percentage of Standard B machinable parcels is sorted at BMCs?
- f. What percentage of Standard B prebarcoded parcels is sorted at BMCs?
- g. What percentage of Standard A machinable parcels is sorted on PSMs retrofitted with a PBCS?
- h. What percentage of Standard A prebarcoded parcels is sorted on PSMs retrofitted with a PBCS?
- i. What percentage of Standard B machinable parcels is sorted on PSMs retrofitted with a PBCS?
- j. What percentage of Standard B prebarcoded parcels is sorted on PSMs retrofitted with a PBCS?

RESPONSE:

- a.-j. The Postal Service does not track information to the level requested in this interrogatory, i.e., it does not have information about the proportions of Standard (A) or (B) parcels sorted at particular types of plants or on particular equipment, *either in total, or for prebarcoded and/or machinable Standard (A) or (B) parcels.*

DECLARATION

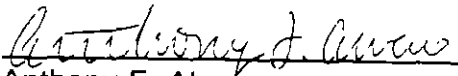
I, Sharon Daniel, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.


SHARON DANIEL

Dated: October 8, 1997

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.


Anthony F. Alverno

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