

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS MODEN TO INTERROGATORY OF  
THE DIRECT MARKETING ASSOCIATION, INC.  
(DMA/USPS-T4-85)

The United States Postal Service hereby provides the response of witness Moden to the following interrogatory of the Direct Marketing Association, Inc.: DMA/USPS-T4-85, filed on October 1, 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



Scott L. Reiter

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October 15, 1997

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

**DMA/USPS-T4-85.** Please refer to your direct testimony at page 9, lines 22-26, and to your response to interrogatory NAA/USPS-T4-7.

- (a) What percentage of total routes are in zones possessing 10 or more city routes and/or rural routes with city style addressing?
- (b) What percentage of the total volume of letters do the routes in subpart (a) receive?
- (c) What percentage of total routes are in zones with five to nine routes?
- (d) What percentage of the total volume of letters do the routes in subpart (c) receive?
- (e) What percentage of total routes are represented by the 1,183 zones with fewer than 10 routes that receive DPS as a result of local decisions?
- (f) What percentage of the total volume of letters do the routes in subpart (e) receive?

**Response:**

- a. Approximately 71% of the total routes are in zones that are served by plants with MPBCSs or DBCSs and have 10 or more city and/or rural routes. Similar to the response to DMA/USPS-T4-85(b), this percentage is not limited to just the rural routes with city style addressing.
- b. Redirected to the Postal Service.
- c. Approximately 8% of the total routes are in zones that destinate at plants with MPBCSs or DBCSs and have 5 to 9 city and/or rural routes.
- d. Redirected to the Postal Service.
- e. The 1,183 zones with fewer than 10 routes that receive DPS as a result of local decisions is less than .1% of the total routes.
- f. Since the zones with fewer than ten routes receive DPS as a result of a local decision, I am unable to provide an estimate of the percentage of the total volume of letters that the routes receive.

## 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: 10/15/97

## 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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