

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

---

Postal Rate and Fee Changes, 2006

---

)  
)  
)

Docket No. R2006-1

THIRD INTERROGATORIES OF DIRECT MARKETING ASSOCIATION  
TO GREETING CARD ASSOCIATION WITNESS  
JAMES A. CLIFTON (DMA/GCA-T1-10-12)

(October 4, 2006)

Pursuant to sections 25 and 26 of the Rules of Practice, Direct Marketing Association directs the following interrogatories to Greeting Card Association witness James A. Clifton (GCA-T-1).

Respectfully submitted,

---

Dana T. Ackerly II  
Counsel for Direct Marketing  
Association  
Covington & Burling LLP  
1201 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
Tel: 202-662-5296  
Fax: 202-778-5296  
email: dackerly@cov.com

DIRECT MARKETING ASSOCIATION INTERROGATORIES  
TO GCA WITNESS JAMES A. CLIFTON, GCA-T-1

DMA/GCA-T1-10. Please refer to your response to DMA/GCA-T1-3(b), where you state that “From the latest publicly available reliable data I have seen, a majority of the banking industry’s mail volume in First Class continues to be mailed at the full single piece rate.”

- a) Please produce the “latest publicly available reliable data” to which you refer.
- b) Please explain how you verified that the data are reliable.

DMA/GCA-T1-11. Please refer to your response to DMA/GCA-T1-3(b), where you state that “This probably reflects the fact that banks outside of urban and suburban areas do not necessarily have access to a presort bureau and do not have enough mail volume to warrant leasing or purchasing automation machinery.”

- a) Please define what you mean by the phrase “have access to a presort bureau.”
- b) What is the maximum distance between a bank and the nearest presort bureau for use of a presort bureau to be practical and cost effective?
- c) What percentage of First-Class Mail entered by banks is generated within 25 miles of a presort bureau? Within 50 miles? Within 100 miles? Within any other distance for which you have data?
- d) What is the minimum size of a local market needed to support a presort bureau?
- e) What percentage of First-Class mail entered by banks is generated in communities equaling or exceeding the size identified in response to part (d)?
- f) What is the minimum mail volume generated by a bank to warrant leasing or purchasing its own automation machinery?
- g) What percentage of First-Class mail entered by banks is generated by banks with a mail volume equaling or exceeding the minimum identified in response to part (f)?
- h) Please produce all data, studies and analyses that support your answers to the previous parts of this interrogatory.
- i) Please produce any other data, studies and analyses indicating that banks outside of urban and suburban areas lack access to a presort bureau.

DMA/GCA-T1-12. Please refer to your response to DMA/GCA-T1-3(b), where you state that “Less than 6% of the bank industry’s volume of mail and cost of mail is posted at Standard A Regular Rates according to the public available reliable data I have seen.”

- a) Please produce the “publicly available reliable data” to which you refer.

b) Please explain how you verified that the data are reliable.