

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

Postal Rate and Fee Changes, 2006)
) Docket No. R2006-1
)

FIRST INTERROGATORIES OF DIRECT MARKETING ASSOCIATION
TO USPS WITNESS A. THOMAS BOZZO (DMA/USPS-T46-1)

(June 20, 2006)

Pursuant to sections 25 and 26 of the Rules of Practice, Direct Marketing Association directs the following interrogatories to USPS witness A. Thomas Bozzo (USPS-T-46). If the witness is unable to respond to any interrogatory, we request that a response be provided by an appropriate witness capable of providing an answer.

Respectfully submitted,

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DIRECT MARKETING ASSOCIATION INTERROGATORIES
TO USPS WITNESS A. THOMAS BOZZO, USPS-T-46

DMA/USPS-T46-1. Please refer to your description of the Beta test in USPS-T-46.

- a) Were the Beta sites randomly selected?
- b) If they were not, on what basis were they selected?
- c) To the extent that the Beta sites were not randomly selected, does this imply that the IOCS samples for the year that did not include the beta sites do not comprise a random sample? Please fully explain your response.
- d) If the Beta sites were not randomly selected, please describe how one can rule out the hypothesis that the differences shown in Table 1 Tally Subclass Distribution could be caused by differences between Beta and NonBeta test sites, rather than by the revised IOCS software.