

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

**Repositionable Notes Market Test**

**Docket No. MC2004-5**

**RESPONSE OF  
POSTCOM AND MFSA TO ORDER NO. 1419**

The Association for Postal Commerce and Mail Fulfillment Services Association (collectively "PostCom, et al.") have the following response to the questions propounded by the Commission in Order 1419:

1. Assuming that The Direct Marketing Association's Motion to Conduct Limited Cross-Examination of Postal Witnesses Holland and Kaneer is granted – as we believe it should be – PostCom et al. will have very limited follow-up oral cross-examination of those witnesses.
2. PostCom, et al. do not seek discovery or oral cross-examination of witness Jerry Tidwell.
3. PostCom, et al. are unable to state whether we wish to file briefs in this provisional phase of this docket. The necessity for briefs may depend on the outcome of cross-examination of the Postal Service witnesses and rebuttal testimony (if any) that the Postal Service elects to file. PostCom, et al. are, however, prepared to state that any brief that we may submit will be filed not more than 5 days (or 3 working days) after release of the transcript of any hearing held at this stage of the case.

Respectfully submitted,

Ian D. Volner  
Rita L. Brickman  
Venable LLP  
575 7<sup>th</sup> Street, N.W.  
Washington, DC 20004-1601  
(202) 344-4800

[idvolner@venable.com](mailto:idvolner@venable.com)  
[rlbrickman@venable.com](mailto:rlbrickman@venable.com)

Counsel to  
Association for Postal Commerce  
Mailing & Fulfillment Service Association

September 27, 2004

DC2:583679