

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

MAILING ONLINE EXPERIMENT)
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Docket No. MC2000-2

**MAIL ADVERTISING SERVICE ASSOCIATION INTERNATIONAL
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: PLUNKETT (MASA/USPS-T5-1-7)
(December 29, 1999)**

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, Mail Advertising Service Association International ("MASA") hereby submits interrogatories to United States Postal Service witness Michael K. Plunkett. For purposes of these interrogatories, "MOL" refers to the MOL Service that is the subject of these proceedings.

INTERROGATORIES

MASA/USPS-T5-1. Referring to the "product specific costs" that are the subject of your testimony at page 5 through 7 of your testimony:

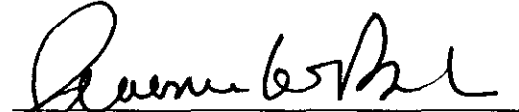
- a. Confirm that the product specific costs are \$30,303,917 over the life of the experiment (USPS-5D, line 8, as corrected in response to OCA/USPS-T5-1).
- b. Confirm that product specific costs have not been attributed to MOL as part of the cost base to which your mark-up is applied.

- c. Confirm that you have assumed that product specific costs would be recovered over a three year period out of the mark-up portion of the fees charged MOL users.
- d. Identify each asset acquired or created through the expenditure of product specific costs, state the cost of acquisition, and provide your understanding of the depreciable life of the asset (and the basis for that understanding).
- e. Account for any portion of product specific costs not assigned to an asset identified in response to subpart d and state how this portion would be treated with respect to depreciation or amortization.
- f. Identify all workpapers, exhibits, or other references upon which you relied for the determination of amount of product specific costs, and the individual components of product specific costs.

MASA/USPS-T5-2. Do any of the components of product specific costs involve expenditures that are likely to recur over the life of MOL? If so, identify those components of product specific costs that fall in this category.

MASA/USPS-T5-3. Describe fully the ways in which your 30% markup methodology differs from the mark-up methodology you used in MC98-1.

Respectfully submitted,



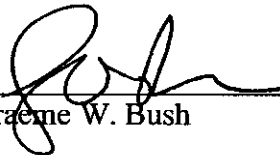
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Counsel for Mail Advertising Service
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December 29, 1999

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Mail Advertising Service Association International's Interrogatories to United States Postal Service Witness Plunkett, was served upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice this 29th day of December, 1999.



Graeme W. Bush