

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

MAILING ONLINE EXPERIMENT

Docket No. MC2000-2

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS PLUNKETT TO INTERROGATORIES OF  
MAIL ADVERTISING SERVICE ASSOCIATION  
(MASA/USPS-T1-17-19)

The United States Postal Service hereby provides the responses of witness Plunkett to the following interrogatories of Mail Advertising Service Association: MASA/USPS-T1-17-19, filed on December 28, 1999.

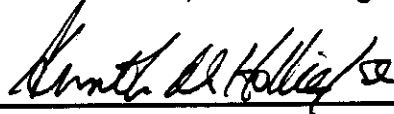
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Kenneth N. Hollies

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS  
PLUNKETT TO INTERROGATORIES OF MAIL ADVERTISING SERVICES  
ASSOCIATION INTERNATIONAL**

**MASA/USPS-T1-17.** Confirm that the USPS plans to accept credit card payments from MOL customers on which it will pay a service charge of not more than 3% of the amount charged.

**RESPONSE:**

Confirmed that Postal Service plans to accept credit card payments.

Confirmed also that all payment methods have costs. I understand that credit card payments are generally less costly than other payment methods employed by the Postal Service, but since I also understand that the costs of payment methods are not attributed to specific services, such costs have not been included in support of the Mailing Online Request.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS  
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ASSOCIATION INTERNATIONAL**

**MASA/USPS-T1-18.** What forms of payment for MOL other than credit cards will be accepted by the Postal Service during the experimental period? What service charges or fees will be paid by the Postal Service in connection with each form of payment? What proportion of total payments during the experimental period will be made using each form of expected payment?

**RESPONSE:**

See the eighth bullet in section III of USPS-T-1. I do not know what, if any, service charges or fees would apply to use of prepaid accounts or other potential payment methods, although I understand such costs are generally not attributed to specific services. I know of no means by which the proportions of various payment methods might reasonably be projected.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS  
PLUNKETT TO INTERROGATORIES OF MAIL ADVERTISING SERVICES  
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**MASA/USPS-T1-19.** Confirm that the initial printer contract entered into during the market test provided for a guaranteed minimum payment of \$325,000.

- a. How much was paid to the printer in connection with MOL print jobs under the terms of this contract?
- b. Was any payment made by the Postal Service in satisfaction of the guaranteed minimum provision? If so, how much? If not, why not?
- c. Do the printer contracts that the Postal Service is putting out for bid during the experimental period contain a guaranteed minimum provision?

**RESPONSE:**

- a. I understand the payments reported in the market test data reports approximate \$25,000.
- b. Yes. \$251,867 has been paid.
- c. I believe they do; a final answer will be available when the printer contract is filed.

DECLARATION

I, Michael K. Plunkett, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Michael K. Plunkett

Dated: 1/10/00

## 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 "Kenneth N. Hollies", is written over a horizontal line.

Kenneth N. Hollies

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