

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
QUESTIONS RAISED DURING HEARINGS
(January 19, 2000)


The United States Postal Service hereby provides the responses of witness Plunkett to two questions raised during hearings on the Postal Service direct case on January 12 and 13, 2000. The questions are paraphrased from the transcript, with each followed by its response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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January 19, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
PLUNKETT TO QUESTIONS RAISED DURING HEARINGS**

QUESTION 1: Does the response to MASA/USPS-T1-4 fail to address the impact of plex options? (Tr. 2/210-11)?

RESPONSE:

Yes. Mailing Online version 3.0 will not have the capability to combine in a single batch documents that have different plex characteristics, all other things being equal.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
PLUNKETT TO QUESTIONS RAISED DURING HEARINGS**

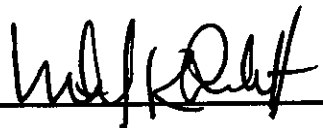
QUESTION 2: At Tr. 3/499, witness Plunkett indicated his lack of complete confidence regarding how the presort software used for Mailing Online sorted jobs that would not traditionally satisfy volume minimums for respective subclasses.

RESPONSE:

Typically, mail presortation software like that used in Mailing Online does not presort a mailing unless it has sufficient pieces to qualify for worksharing discounts, i.e. a 499 piece First-Class mailing would receive no presortation whatsoever. However, PostalSoft, the product used by Mailing Online, has been tweaked to permit any and all presortation to take place regardless of the number of pieces. The actual presortation achieved can and will be reported to the Commission. See Tr. 8/1770 (Docket No. MC98-1).

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.



Dated: January 19, 2000

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.

K N Hollies

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