

ORIGINAL

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

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MAILING ONLINE SERVICE  
OFFICE OF THE SECRETARY

MAILING ONLINE SERVICE

Docket No. MC98-1

**FIRST INTERROGATORIES OF  
MAIL ADVERTISING SERVICE ASSOCIATION INTERNATIONAL  
TO USPS WITNESS GARVEY  
(USPS-T1-1-11)**

In accordance with Order No. 1216 of the Postal Rate Commission, the witness is requested to provide written responses to the following interrogatories within 10 days of the date hereof. For purposes of these interrogatories, "MOL" refers to the Mailing Online Service that is the subject of these proceedings.

MASA/USPS-T1-1. Identify the "increased functionality" referred to in note 2 to your testimony. Describe each feature encompassed by this term, and for each one state whether it has been discussed at the Postal Service, whether any information has been generated concerning the cost and desirability of offering the feature (and, if so, describe such information in detail), and when it could be provided as part of the MOL service.

MASA/USPS-T1-2. Identify the "increased user utility" referred to in note 2 to your testimony. Describe each feature encompassed by this term, and for each one state whether it has been discussed at the Postal Service, whether any information has been generated concerning the cost and desirability of offering the feature (and, if so, describe such information in detail), and when it could be provided as part of the MOL service.

MASA/USPS-T1-3. Describe all consideration given by the Postal Service to the question whether any volume of MOL mail will be diverted from other sources of mail. Include in your answer the identification of any study bearing on this question, and produce any report of any consideration bearing on this question.



MASA/USPS-T1-4. At page 9 of your testimony, you state that "virtually all direct mail materials are designed using desktop computer technology." State in detail the basis for this assertion, and include in your answer an identification of all information sources upon which you relied or to which you referred in reaching the conclusion stated in your testimony.

MASA/USPS-T1-5. At page 9 of your testimony, you state that one third of all direct mail pieces designed using desktop computer technology "are produced in short-run quantities" (defined elsewhere in your testimony as consisting of mailings in volumes of less than 5000).

- (i) State in detail the basis for this assertion. Include in your answer an identification of all information sources upon which you relied or to which you referred in reaching the conclusion stated in your testimony.
- (ii) Confirm that all of the short run direct mail pieces referred to are part of the potential market for MOL. If you cannot confirm, state why not and describe the categories of short run direct mail pieces referred to that are not part of the potential market for MOL and why not.
- (iii) State what the volume estimates are for short run direct mail pieces referred to in your testimony.
- (iv) Confirm that all of the short run direct mail pieces referred to in your testimony referenced above are currently being sent through the mail. If you cannot confirm, state why not and describe the categories of short run direct mail pieces referred to in your testimony that are not now sent through the mail.
- (v) For those pieces of short run direct mail now sent through the mail, identify the rate categories at which they are currently sent and the percentages of such mail sent at each category.
- (vi) State whether any estimates have been made of how much of the mail projected to use MOL will come from each of the rate categories at which it is currently mailed.
- (vii) State whether any estimate has been made of how much of the volume projected for MOL is currently being prepared and entered into the mail stream by lettershops or other third party providers of mailing services, as opposed to being presented directly by the customer for whom the piece is mailed. If the answer to the question is yes, state in detail the manner in which the estimate was made and the results obtained.

MASA/USPS-T1-6.

(a) Are there any qualification criteria that would make MOL undesirable or unavailable for long run print jobs (defined for purposes of this interrogatory as any mailing that is 5000 pieces or more)? If so, identify each such criterion and explain its impact on long run print jobs.

(b) Are there any other factors (e.g., capacity limitations, design limitations, etc.) that, in your view, would cause MOL not to be used by mailers for long run print jobs? If so, identify each such factor and explain why it would have this effect.

(c) With respect to each criterion and factor identified in response to the preceding subsections of this interrogatory, are there any modifications to MOL under discussion for future implementation that would ameliorate the limitations on MOL for long run print jobs? If so identify the modifications and state what the Postal Service's plans are with respect to their implementation.

MASA/USPS-T1-7. Confirm that the "time-specific entry, graphic flexibility, and production convenience" referred to at page 9 of your testimony are, in your view, all features of MOL. If you cannot confirm, explain why not.

(a) For that part of the projected MOL volume that will come from mail pieces already in the mail stream, state in what respects you believe that MOL is superior to the rate categories at which the mail is already being carried.

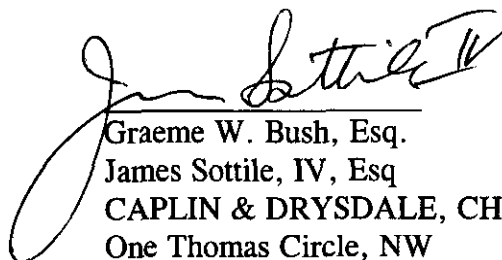
MASA/USPS-T1-8. Referring to lines 13-15 on page 12 of your testimony, describe in detail the "procurement strategy" and identify who is referred to as "qualified service providers."

MASA/USPS-T1-9. Referring to your testimony at line 14 page 13, describe in detail the way in which "[l]ettershops may be impacted by Mailing Online." Include in your answer a detailed description of any attempt by the Postal Service to quantify any loss of business that may be suffered by lettershops as a result of MOL.

MASA/USPS-T1-10. Referring to your testimony at line 17 of page 13, describe in detail "the shift into electronic methods" referred to and how any such shift would impact lettershops in your opinion. Identify all source material on which your opinion is based.

MASA/USPS-T1-11. Who are the "established players" referred to and what is the basis for your understanding as stated in the second paragraph of your testimony on page 13?

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "James Sottile, IV", is written over a horizontal line. The signature is fluid and cursive, with a large loop at the beginning and a stylized "IV" at the end.

Graeme W. Bush, Esq.

James Sottile, IV, Esq

**CAPLIN & DRYSDALE, CHARTERED**

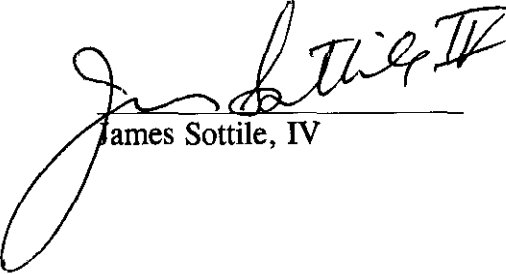
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Counsel for Mail Advertising Service  
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing interrogatories were served by first class mail on the parties on the attached service list this 4th day of August 1998.

  
James Sottile, IV

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