

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

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POSTAL RATE  
COMMISSION  
OFFICE OF THE SECRETARY

MAILING ONLINE SERVICE

Docket No. MC98-1

**FIRST INTERROGATORIES OF  
MAIL ADVERTISING SERVICE ASSOCIATION INTERNATIONAL  
TO USPS WITNESS SECKAR  
(MASA/USPS-T2-1-4)**

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-T2-1. Confirm that a "batched" mailing, as described in your testimony at page 9, is one where a mailing by one customer is combined with a mailing or mailings by other customers of MOL. If confirmed, identify each process for which the mailings are so combined. If not confirmed, state what is meant by "batched" in your testimony.

MASA/USPS-T2-2. How is it determined what mailings will be batched? Please address specifically the operational procedures that determine what mailings are batched, including over what time period a customer's mailing is held before it is sent to print shops at Step 5 in Diagram 1 of your testimony.

MASA/USPS-T2-3. Confirm the following. In the event you are unable to confirm, explain in detail why not.

(a) A MOL mailing is not required to meet all the criteria for the rate at which it will be mailed and based on which the customer will be charged postage.

(b) You have not presented as part of your testimony any cost justification for the postage component of the total price charged a MOL customer.



(c) In proposing the several postage options to be charged MOL customers, you have assumed that, as a result of the batching of different mailings by the contract printers, MOL mailings presented to the Post Office by the contract printers will generally meet the qualifications established in the DMM and the DMCS for the postage rates charged to the customer. If your answer is yes in whole or in part, describe in detail the studies, analyses or other bases you have for making this assumption.

MASA/USPS-T2-4. Confirm that:

(a) for the so-called contractual printer components of MOL, a customer will be charged 125% of the price negotiated between the contractual printer and the Postal Service.

(b) for services rendered in connection with an MOL mailing, the contractual printer will be paid the contract price negotiated with the Postal Service, and the Postal Service will retain the markup of 25%.

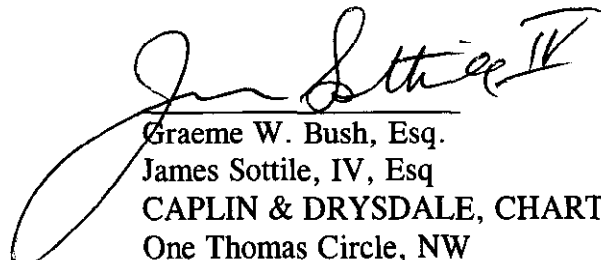
(c) the costs estimated for contractual printer services associated with MOL do not include a profit component for the printer.

(d) all other things being equal, the average price charged for contractual printer services can be expected to exceed the costs you have estimated, the increase to reflect the profit realized by the printer on the services he renders.

If you are unable to confirm any of the foregoing, explain in detail the reason(s) you are unable to confirm.

MASA/USPS-T2-4. Explain the basis for your apparent assumption that the costs you have estimated for contractual printing services are an accurate predictor of the contractual prices to be negotiated by the Postal Service with contractual printers.

Respectfully Submitted,

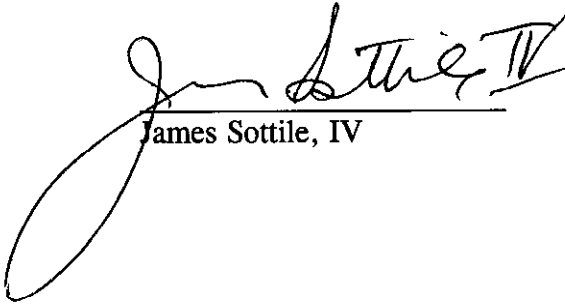


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CERTIFICATE OF SERVICE

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.



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