

ORIGINAL

**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

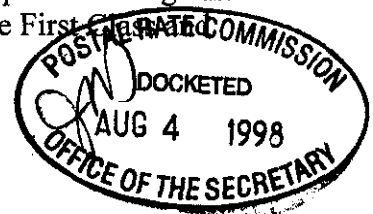
**SECOND INTERROGATORIES OF
MAIL ADVERTISING SERVICE ASSOCIATION INTERNATIONAL
TO USPS WITNESS PLUNKETT
(MASA/USPS-T5-9,10)**

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.

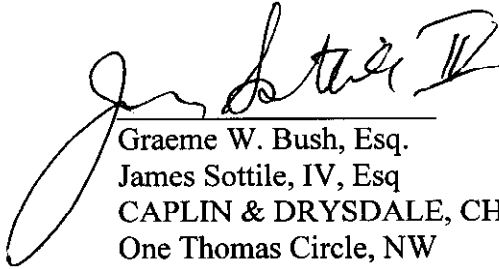
MASA/USPS-T5-9. At various places in your testimony you state that 62% of the projected MOL mail "would have been prepared and entered as mail notwithstanding the availability of Mailing Online" (p.9), and that 38 percent of Mailing Online pieces would not have been mailed in the absence of the service" (p. 7), in each case citing LR-2 at 38. Describe in detail how these percentages were derived. Confirm that they are not found at the cited page in LR-2, and that the proper reference is page 33 of LR-2.

MASA/USPS-T5-10. You state at page 15 of your testimony that "Postal Service software used for Mailing Online will ensure that all Mailing Online volume is sorted in conformity with the most current sort plans available, and with the greatest possible depth."

- (a) Describe in detail what this testimony refers to.
- (b) Confirm that MOL mail will achieve sortation levels and depth beyond that required for the automation rates paid by the customer.
- (c) Confirm that MOL mail will achieve greater sortation and depth on average than automation mail presented directly to the Postal Service by mailers using the First-Class Standard Mail Automation categories available to MOL users.



Respectfully submitted,

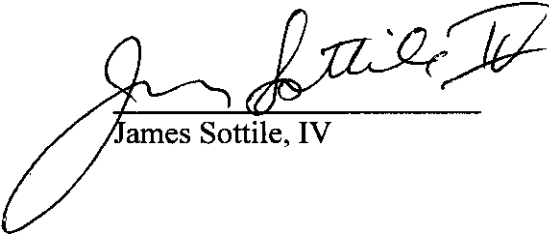
A handwritten signature in black ink, appearing to read "Graeme W. Bush", is written over a horizontal line.

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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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