

CONFIDENTIAL

**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 ROTHSCHILD
(MASA/USPS-T4-1-4)**

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.

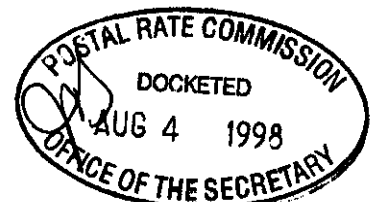
MASA/USPS-T4-1. Reconcile your statement at page 3 of LR-2 that "[t]he focus groups were configured to represent the full range of potential end users," with your statement at page 2 of LR-2 that one of the qualifications for inclusion in the focus groups was that the organization "distribute less than 5000 copies of the application at one time."

MASA/USPS-T4-2. Confirm that potential end users of MOL include organizations that mail 5000 or more copies of an application at one time.

MASA/USPS-T4-3. Describe each of the "existing hybrid mail products" referred to at page 3 of LR-2.

MASA/USPS-T4-4. Describe in detail the basis for the following statement at page 33 of LR-2:

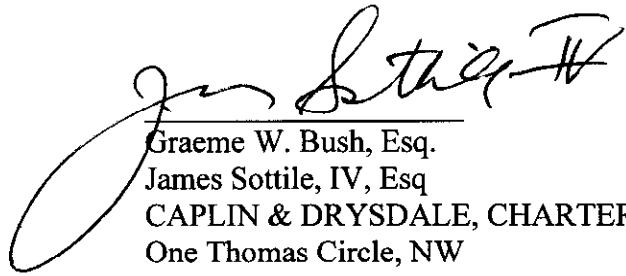
[I]n Year 1, 38% of the total volume of the basic NetPost service at the 25% contribution margin is likely to be incremental pieces to the Postal Service.



(a) Confirm that by “incremental pieces to the Postal Service,” you mean pieces that would not otherwise be mailed in the absence of MOL. If you cannot confirm, explain the reason(s) you cannot confirm.

(b) When you use the term “basic NetPost,” are you referring to the “basic” as opposed to the “enhanced” service as defined in LR-2? If so, what percentage of volume projected for the enhanced service is likely in your view to represent incremental volume? State in detail the basis for your response.

Respectfully submitted,

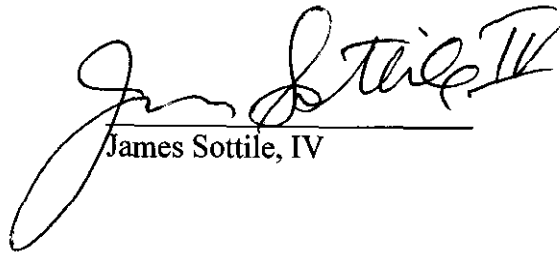


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Certificate of Service

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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