

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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MAILING ONLINE SERVICE

Docket No. MC98-1

DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS MICHAEL K. PLUNKETT (DFC/USPS-T5-1-2)

August 3, 1998

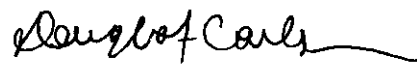
Pursuant to sections 25 and 26 of the *Rules of Practice*, I, Douglas F. Carlson, hereby submit interrogatories to United States Postal Service witness Michael K. Plunkett.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

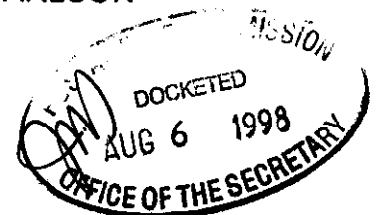
The instructions contained in my interrogatories to witness Garvey (DFC/USPS-T1-1-6) are incorporated herein by reference.

Respectfully submitted,

Dated: August 3, 1998



DOUGLAS F. CARLSON



DFC/USPS-T5-1.

Please refer to your testimony at page 3, lines 14–17. Suppose a customer who lives in a “high-cost area” is using Mailing Online to send documents to a “low-cost area.” Suppose, further, that a Mailing Online printing contractor is located near this “low-cost area,” and this printing contractor experiences costs that are lower than the costs that the printers in this mailer’s local, “high-cost area” experience and incorporate into their prices.

a. Please explain why the Postal Service’s proposed pricing system would be any less “unfairly detrimental to existing providers of comparable services” in this example than a pricing system where prices were based on the higher average national costs.

b. Please confirm that the Postal Service’s proposed pricing system may, in this example, be *more* “unfairly detrimental to existing providers of comparable services” than a pricing system where prices were based on average national costs would be, since this mailer will face a lower price using this proposed pricing system than he would if the Postal Service used national average costs.

DFC/USPS-T5-2. Please refer to your testimony at page 11. Will Mailing Online check addresses against the National Change-of-Address database and update an address if the recipient has filed a permanent change-of-address order? If not, please explain why not.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice*.



DOUGLAS F. CARLSON

August 3, 1998
Emeryville, California