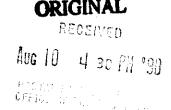
BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001



MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS HAMM TO INTERROGATORIES OF
DAVID B. POPKIN
(DBP/USPS-T6-2-3)

The United States Postal Service hereby provides responses of witness Hamm to the following interrogatories of David B. Popkin: DBP/USPS-T6-2-3, filed on July 30, 1998. Interrogatory DBP/USPS-T6-1 was redirected to witness Seckar.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-3083; Fax -5402 August 10, 1998



RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HAMM TO INTERROGATORIES OF DAVID B. POPKIN

DPB/USPS-T6-2. On line 18 of Page [sic] 2 of your testimony you state that PIA members are eager to participate.

- a. How many of the approximately 15,000 members were contacted to determine their response and desires?
- b. How many members provided an unqualified eagerness to participate?
- c. How many members provided a desire to participate with reservations?
- d. How many members indicated that they were reluctant to participate?

Response.

a-d. In April 1998, a draft Request for Proposal was sent through the Mailing Online Web site to the members of the PIA's Digital Printing Council (DPC) and to the DPC Steering Committee and Vendor Advisory Committees. This program focuses solely on digital printing and its applications (i.e., Mailing Online). The total number mailed, was approximately 250. The group was asked to make comments, deletions and additions to the request.

PIA's Economics Department also tracks our members needs and services, and the industry's economic trends. What the economists have found is that our members are always looking for new services in hopes of finding new revenue sources.

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DBP/USPS-T6-3. Since you are potentially a printing contractor for this service, what compensation, if any, has the Postal Service paid you for your testimony? **RESPONSE.**

None. I am a volunteer leader at PIA and receive no compensation. I am currently the Co-Chair of the Digital Printing Council.

DECLARATION

I, John Hamm, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Joh m. Ham

Dated: August 10, 1998

CERTIFICATE OF SERVICE

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

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 August 10, 1998