Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Mailing Online Service

Docket No. MC98-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS GARVEY TO INTERROGATORY OF
MAIL ADVERTISING SERVICE ASSOC.
(MASA/USPS-T5-10 REDIRECTED FROM WITNESS PLUNKETT)

The United States Postal Service hereby provides the response of witness

Garvey to the following interrogatory of Mail Advertising Service Assoc.: MASA/USPS-

T5-10, filed on August 4, 1998, and redirected from witness Plunkett.

The interrogatory is stated verbatim and is followed by the response.
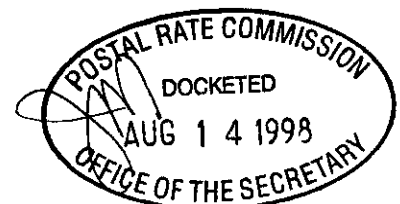
Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Kenneth N. Hollies

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Washington, D.C. 20260-1137
August 14, 1998

RESPONSE OF POSTAL SERVICE WITNESS GARVEY TO
INTERROGATORIES OF THE MAIL ADVERTISING SERVICE ASSOCIATION,
REDIRECTED FROM WITNESS PLUNKETT

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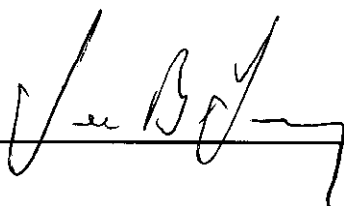
(a) Describe in detail what this testimony refers to.
(b) Confirm that MOL mail will achieve sortation levels and depth beyond that required for the automation rates paid by the customer.
(c) Confirm that MOL mail will achieve greater sortation and depth on average than automation mail presented directly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

RESPONSE:.

(a) As described in my answer to OCA/USPS-T1-17, approved commercial

presort software is an integral part of the Mailing Online system. Planned

regular updates will keep this presort module current with the most recent

sort plans available. The software is used to sort batches to the greatest

possible depth before transmittal to the print sites.

(b) Unable to confirm. However, if Mailing Online succeeds in attracting the

numbers of users we seek, we predict that large volumes of locally

destinating mail will flow through the MOL system and allow high densities

and levels of sort beyond those required for the requested basic automation

rate. We will test this hypothesis during the market test and experimental

service periods.

(c) Unable to confirm. See my answer to 10 (b) above.

DECLARATION

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

Dated: _8/14/98_

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

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