

ORIGINAL

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

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MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PLUNKETT TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T5-24-27)

The United States Postal Service hereby provides responses of witness Plunkett to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T5-24-27, filed on August 7, 1998.

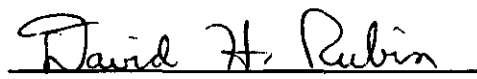
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

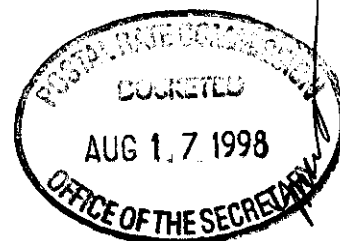
UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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475 L'Enfant Plaza West, S.W.
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August 17, 1998



**RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO INTERROGATORIES
OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T5-24. Please refer to your testimony at page 6, line 2.

- a. Please explain in detail how the markup figure of 25 percent was selected. Please include all documents related to the selection process.
- b. Please explain whether any other markup figures were considered and, if so, why they were rejected.

OCA/USPS-T5-24 Response.

- a. Please see pages 18-21 of my testimony. The selection of the 25 percent figure was a result of discussions among a group of Postal Service employees and contractors, including witnesses Seckar and Garvey. I am not aware of any documents relating to the selection of this figure other than my testimony (USPS-T-5) which itself relies upon the market research presented in USPS-LR-2/MC98-1.
- b. As indicated in USPS-LR-2/MC98-1, the Postal Service commissioned market research which tested markups of 25 percent and 50 percent. The reasons for using 25 percent are explained in my testimony at pages 18-21.

**RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO INTERROGATORIES
OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T5-25. Please refer to your testimony at page 11, lines 20-22. Please confirm that the proposed classification change exempting Mailing Online mail pieces entered as First-Class Mail from the 500 piece minimum is a temporary classification change, lasting for the duration of the experimental service. If you do not confirm, please explain.

OCA/USPS-T5-25 Response.

Confirmed, though the classification change would also apply during the market test period.

**RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO INTERROGATORIES
OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T5-26. Please refer to proposed DMCS language for section 321.231.

- a. Please confirm that the Postal Service is proposing a classification change that will exempt Mailing Online mail pieces entered as Standard Mail from the 200 piece / 50 pound minimum. If you do not confirm, please explain.
- b. Please confirm that any classification change exempting Mailing Online mail pieces entered as Standard Mail from the 200 piece / 50 pound minimum is a temporary classification change, lasting for the duration of the experimental service. If you do not confirm, please explain.

OCA/USPS-T5-26 Response.

- a. Confirmed.
- b. Confirmed, though the classification change would also apply during the market test period.

**RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO INTERROGATORIES
OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T5-27. Please refer to your testimony at page 12, lines 14-16. Please confirm that the proposed classification change exempting Mailing Online mail pieces entered as Standard Mail from the requirement that such pieces be entered at the destination Bulk Mail Center (BMC) in order to obtain DBMC rates is a temporary classification change, lasting for the duration of the experimental service. If you do not confirm, please explain.

OCA/USPS-T5-27 Response.

Confirmed, though the classification change would also apply during the market test period.

DECLARATION

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

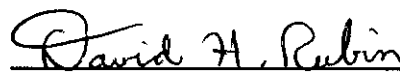


MICHAEL K. PLUNKETT

Dated: August 12, 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.



David H. Rubin

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