

ORIGINAL

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. MC98-1

Mailing Online Service

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS ROTHSCHILD TO INTERROGATORIES OF
OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T4-30-31)

The United States Postal Service hereby provides the response of witness Rothschild to the following interrogatories of Office of the Consumer Advocate: OCA/USPS-T4-30-31, filed on August 5, 1998.

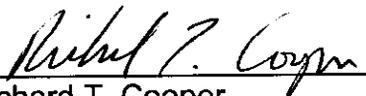
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

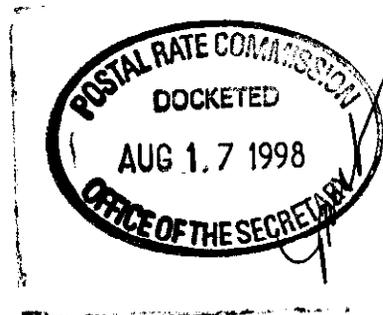
UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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(202) 268-2999; Fax: -5402
Washington, D.C. 20260-1137
August 17, 1998



**Response of Postal Service Witness Rothschild
To OCA Interrogatories**

OCA/USPS-T4-30. The following interrogatory refers to section I of USPS-LR-2/MC98-1. Record 2 of the "Control File" states, "Minimum weight cutoff (can be negative)." Please explain the rationale for having a negative minimum weight cutoff. Include in your explanation examples of instances where a negative minimum weight cutoff is appropriate.

RESPONSE:

The documentation provides a general description of what our software allows. Despite the fact that the software permits a negative minimum weight cutoff, to the best of my knowledge, we have never conducted a study in which negative weights were used.

**Response of Postal Service Witness Rothschild
To OCA Interrogatories**

OCA/USPS-T4-31. Section E of USPS-LR-2/MC98-1 contains version 1 and version 3-5 of questionnaires dated January 1997.

- a. Please provide a copy of version 2 of the questionnaire dated January 1997.
- b. Please explain the purpose of the different versions of the questionnaire dated January 1997.
- c. There are 6 pages after page 19 of the "version 5" questionnaire. Two of the 6 are marked "3" on the bottom, 2 are marked "5" on the bottom, and 2 are unnumbered but are titled "NETPOST SERVICE." One page 5 has a note that appears to indicate it has the 25% contribution margin prices, the other page 5 appears to indicate it has the 50% contribution margin prices.
 - (1) Please confirm that the interpretation of "25%Cont." as 25 percent contribution margin is correct. If you are unable to confirm, please explain.
 - (2) Please confirm that the interpretation of "50%Cont." as 50 percent contribution margin is correct. If you are unable to confirm, please explain.
 - (3) Please explain the purpose of including the 2 seemingly identical page number 3s. If they are not identical, please identify the difference(s).
 - (4) Please explain the purpose of including the 2 seemingly identical unnumbered pages titled "NETPOST SERVICE." If they are not identical, please identify the difference.
- d. Page 5 of the version 5 questionnaire indicates that a separate "five-page brochure that describes NETPOST and its prices" was provided. Please provide a copy of that brochure.

RESPONSE:

- a. To my knowledge, Version 2 was included in the library reference. If it was not, Postal Service counsel will make it available.
- b. There are five versions of the questionnaire because each one corresponds to a different application (i.e., Version 1 = newsletters, Version 2 = direct mail advertising, Version 3= invoices, Version 4 = forms, and Version 5 =

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To OCA Interrogatories**

standardized announcements). The questions in each version are identical except that the application being queried differs.

c-1. Confirm.

c-2. Confirm.

c-3, c-4, d. The materials in the library reference with the title "The NetPost Service" correspond to the brochure. We provided two different versions of the five-page brochure that is described. The brochures are identical except for the prices contained on pages 4 and 5. One brochure presents a 25% contribution margin and the other presents a 50% contribution margin.

DECLARATION

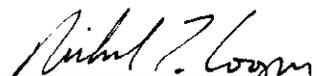
I, Beth B. Rothschild, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Beth B. Rothschild

Dated: 8-17-98

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.


Richard T. Cooper

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