

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

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Mailing Online Service

Docket No. MC98-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
WITNESS ROTHSCHILD TO INTERROGATORY OF  
MAIL ADVERTISING SERVICE ASSOCIATION  
(MASA/USPS-T5-9 REDIRECTED FROM WITNESS PLUNKETT)

The United States Postal Service hereby provides the response of witness Rothschild to the following interrogatory of Mail Advertising Service Association: MASA/USPS-T5-9, filed on August 4, 1998, and redirected from witness Plunkett.

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

Respectfully submitted,

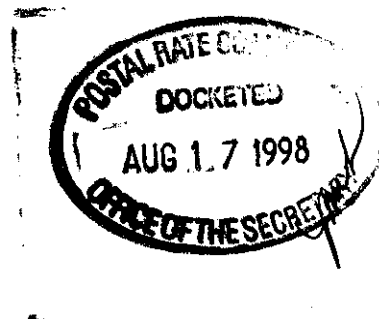
UNITED STATES POSTAL SERVICE

By its attorneys:

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August 17, 1998



**Response of Postal Service Witness Rothschild  
to MASA Interrogatories**

MASA/USPS-T5-9. At various places in your testimony you state that 62% of the projected MOL mail "would have been prepared and entered as mail notwithstanding the availability of Mailing Online" (p.9), and that 38 percent of Mailing Online pieces would not have been mailed in the absence of the service" (p.7), in each case citing LR-2 at 38. Describe in detail how these percentages were derived. Confirm that they are not found at the cited page in LR-2, and that the proper reference is page 33 of LR-2.

**RESPONSE:**

Confirmed. How the percentages were derived can be found in the answer to interrogatory MASA/USPS-T4-4.

**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*  
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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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