

ORIGINAL

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

MAILING ONLINE SERVICE

Docket No. MC98-1

THIRD INTERROGATORIES OF
MAIL ADVERTISING SERVICE ASSOCIATION INTERNATIONAL
TO USPS WITNESS PLUNKETT
(MASA/USPS-T5-11-12)

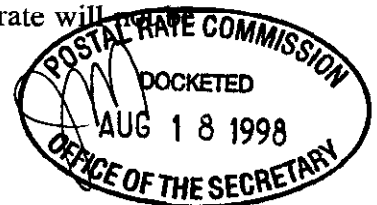
In accordance with Order No. 1216 of the Postal Rate Commission, the witness is requested to provide written responses to the following interrogatories within 10 days of the date hereof. For purposes of these interrogatories, "MOL" refers to the Mailing Online Service that is the subject of these proceedings.

MASA/USPS-T5-11. Refer to your answer to MASA/USPS-T2-3(c), redirected from witness Seckar, in which you confirm that "as a result of batching of different mailings by the contract printers, MOL mailings presented to the Post Office by the contract printers will generally meet the qualifications established in the DMM and the DMCS for the postage rates charged to the customer." In your explanation of this answer, you indicate that it is based on the volume forecasts that "at full implementation," MOL will generate "tens of thousands of pieces per printer per day on average."

a. Confirm that your answer refers to the DMM and DMCS requirements for the postage rates charged to the customer before modification to exempt MOL mail from certain of the normal mailing requirements.

b. How is "full implementation" defined, and when will MOL reach "full implementation"?

c. Is it the Postal Service's expectation that at "full implementation" all MOL mail charged the Standard Basic Automation DBMC rate will be addressed for delivery within the service area of the BMC (or ASF or SCF) at which it is entered by the contract printer? If the answer is yes, describe in detail the basis for the answer. If it is no, describe what volume and percentage of MOL mail charged the Standard Basic Automation DBMC rate will be entered at the DBMC, ASF or SCF?



d. Prior to "full implementation," what volume and percentage of MOL mail that is charged the Standard Basic Automation DBMC rate will not be addressed for delivery within the service area of the BMC (or ASF or SCF) at which it is entered by the contract printer? Answer this question for time points at the end of each month during the market test and experimental periods preferred by the Postal Service as reflected in the Request.

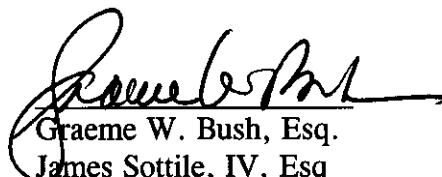
If you are unable to provide numerical estimates, give your best narrative estimates in response to subparts c and d.

MASA/USPS-T5-12. Refer to witness Garvey's Response to POIR-1-1 where he states that "there may be Mailing Online pieces required to be prepared in a manner that would ordinarily allow qualification for a lower 5-digit, 3-digit, or 3/5digit automation presort rate, although they would still pay the basic automation rates (less the DBMC discount for Standard Mail). . . ."

a. For the periods before and during "full implementation," as you use the term in your answer to MASA/USPS-T2-4, redirected from witness Seckar, and extending for each year for which volume estimates have been made, provide estimates of volumes and percentages of MOL mail that would ordinarily allow qualification for a lower automation presort rate. If you are unable to give numerical estimates, provide your best narrative estimates of the volumes of MOL mail that would qualify for each of the referenced presort levels.

b. Assuming that experience demonstrates that significant volumes and/or percentages of MOL mail that is entered by contract printers would ordinarily qualify for lower automation presort rates than those proposed to be charged in this proceeding, is it your expectation that the Postal Service would seek a recommended decision authorizing it to charge a lower rate for MOL mail? If your answer is anything other than an unqualified yes, explain fully.

Respectfully submitted,



Graeme W. Bush, Esq.

James Sottile, IV, Esq

CAPLIN & DRYSDALE, CHARTERED

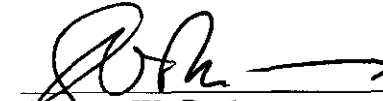
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Association International

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing interrogatories were served in accordance with Rule 12 of the rules of practice this 18th day of August 1998.



Graeme W. Bush