

ORIGINAL

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

RECEIVED

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

MAILING ONLINE SERVICE

Docket No. MC98-1

THIRD SET OF INTERROGATORIES OF  
MAIL ADVERTISING SERVICE ASSOCIATION INTERNATIONAL  
TO USPS WITNESS ROTHSCHILD  
(MASA/USPS-T4-6 - 8)

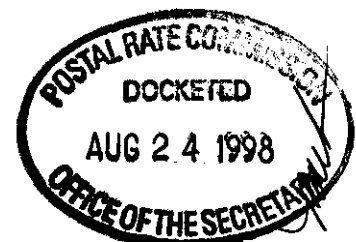
In accordance with Order No. 1216 of the Postal Rate Commission, the witness is requested to provide written responses to the following interrogatories within 10 days of the date hereof. For purposes of these interrogatories, "MOL" refers to the Mailing Online Service that is the subject of these proceedings.

MASA/USPS-T4-6. Refer to witness Garvey's response to MASA/USPS-T1-5(i), in which he states that National Analysts provided the information that one third of all direct mail pieces designed using desktop computer technology "are produced in short-run quantities" (defined as consisting of mailings of less than 5000 pieces). State in detail the basis for this information. Include an identification of all information sources, market surveys, research or other sources upon which you relied or to which you referred in reaching the conclusion attributed to National Analysts by witness Garvey.

MASA/USPS-T4-7. Were the participants in your survey told a price at which NetPost would be available to them in connection with questions they were asked about their likely use of the service (see e.g., Q3, 4, 11, 12)?


(a) If so, what was the price, how were they informed of the price, and where does the price appear in the questionnaire or other survey material attached to your report?

(b) If not, explain how you were able to estimate volumes for NetPost without identifying the price at which the service would be offered.



MASA/USPS-T4-8. Confirm that if MOL were not limited to short-run mailings (defined as less than 5000 pieces), and that mailings of greater than 5000 pieces would qualify for the service, then your market survey did not represent the full range of potential end users of MOL. If you cannot confirm, explain why in detail. If you do confirm, provide any information you have with respect to what the potential volume is from mailings greater than 5000 pieces.

Respectfully submitted,

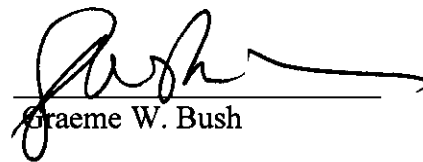


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Association International

Certificate of Service

The undersigned hereby certifies that the foregoing interrogatories were served in accordance with Rule 12 of the Rules of practice this 24th day of August 1998.



Graeme W. Bush