

ORIGINAL

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

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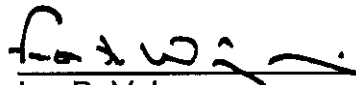
Mailing Online Services)
_____))
_____)

Docket No. MC98-1

FIRST SET OF INTERROGATORIES OF PITNEY BOWES INC.
TO USPS WITNESS ROTHSCHILD
(PB/USPS-T4-1-3)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, Pitney Bowes Inc. ("PB") hereby propounds the attached interrogatories and requests for the production of documents. The instructions for responding contained in the First Set of Interrogatories of Pitney Bowes Inc. to USPS Witness Plunkett are incorporated by reference.

Respectfully submitted,



Ian D. Volner
N. Frank Wiggins
Venable, Baetjer, Howard & Civiletti, LLP
1201 New York Avenue, NW
Washington, DC 20005
(202) 962-4800

Aubrey M. Daniel III
Carolyn H. Williams
Williams & Connolly
725 12th Street, NW
Washington, DC 20005

Counsel to Pitney Bowes Inc.

PB/USPS-T4-1

Please refer to the projected nationwide demand for total NETPOST services in each of the years for which you report in Tables 15 and 16 (pages 34 and 35) of library reference USPS-LR-2/MC98-1.

- a. Do you believe that the prices for various categories of NETPOST service disclosed to your survey respondents were important to the accuracy of the survey results? If not, please explain why not.
- b. If the price points used in your survey were significantly below the price that will actually be charged during the Mailing Online market test, will the volumes that you report be overstated?
- c. Please define your understanding of the word "significantly" as you formulated your answer to the question immediately above and explain any negative answer to that question.
- d. If, for any reason, the volumes projected by your survey results and analysis can thought overstated, are there adjustments that can be made to the data or your analysis of them to come to a better estimate? If so, please explain what they are, with particular reference to volume overstatements resulting from price understatements in the course of the conduct of the survey.

PB/USPS-T4-2

Was any government agency (or sub-part of a government agency) a participant in the survey reported in Library Reference USPS-LR-2/MC98-1 (LR-2)?

PB/USPS-T4-3

The study that you sponsor reports ". . . in Year of 1, 38% of the total volume of the basic NETPOST at the 25% contribution margin is likely to be incremental pieces to the Postal Service." LR-2 at 33. Please display the calculation that leads to this conclusion and identify the source of each factor in that calculation in USPS-LR-12/MC98-1.

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served this document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: October 26, 1998

Ian D. Volner
Ian D. Volner