

ORIGINAL

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

RECEIVED

Nov 5 10 59 AM '98

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Mailing Online Services

)
)
)
Docket No. MC98-1

FIRST SET OF INTERROGATORIES OF PITNEY BOWES INC.
TO USPS WITNESS PLUNKETT
(PB/USPS-T5-1-3)

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.

DC1:82339

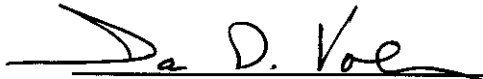


- PB/USPS-T5-1 Please confirm that your calculation of "revenue leakage for Standard (A) letters multiplies your calculation of existing volume by the difference between the Standard (A) regular basic letter piece rate of .235 (rounded by you to .24) less the .167 per piece that you contend should apply to MOL Standard (A) letters. If you are not able to confirm, please explain why.
- PB/USPS-T5-2 Assume that a mailing of MOL letters has fewer than 200 pieces. Confirm that the rate applicable to this mailing would be .33 per piece. If you cannot confirm, please explain why.
- PB/USPS-T5-3 In the circumstances described in interrogatory 2 above, please confirm that the Standard (A) letter revenue leakage occasioned by implementation of MOL would be 18.294 million ($11,232 * (.33 - .167)$) instead of the 7.564 million that you show for year 1 at USPS-T-5 Exhibit D at 1. If you cannot confirm, please explain why.
- a. In the circumstances described immediately above, do you believe that the illustrative revenue leakage should be considered a cost of the MOL program that should be borne by MOL users? If not, why not?

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: November 4, 1998



Ian D. Volner