

ORIGINAL

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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**Mailing Online Services**  
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**Docket No. MC98-1**

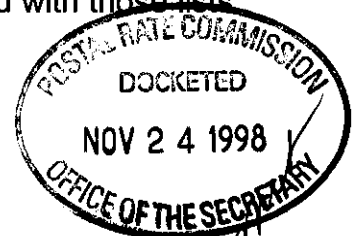
**REQUEST TO RENEW "PITNEY BOWES' REQUEST  
FOR LEAVE TO SUBMIT LATE FILED INTERROGATORIES"**

In the course of the hearings held on Wednesday, November 18, 1998, the Presiding Officer directed Pitney Bowes to signal its intention either to renew or to withdraw the above-referenced discovery motion by November 24, 1998. Tr.5/905. It is Pitney Bowes' intention to renew that motion.

Pitney Bowes does wish to conduct limited further discovery of the Postal Service on protected Library Reference 16. We will keep our discussion of the scope of that discovery here very general to avoid the necessity of filing this pleading under seal.

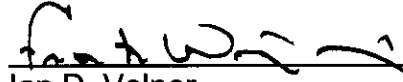
The protected document contains some information about marketing costs for the Mailing Online program but does not clearly delineate the cost of that program and associated Postoffice Online offerings. We will pose questions seeking to obtain such a differentiation in order to know more clearly what additional costs ought to be associated with the Mailing Online offering.

The protected document also makes reference to a direct mail promotion; Pitney Bowes will seek clear identification of the mailing lists to be employed for that purpose in order to determine whether some cost (or imputed benefit) associated with those lists should be charged to the Mailing Online enterprise.



We will also seek to obtain current information about the advertising elements reported in the protected document to be "in development" at the time that the document was prepared.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ian D. Volner", is written over a horizontal line.

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DC1/84194

**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 24, 1998

  
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N. Frank Wiggins