

ORIGINAL

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

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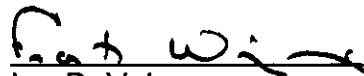
_____)
Mailing Online Services)
_____)

Docket No. MC98-1

**PITNEY BOWES INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS TO OCA WITNESS CALLOW
(PB/OCA-T-100-1-10)**

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,



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- PB/OCA-T-100-1 Have you analyzed whether any increase in computing capacity (i.e., program size, memory requirements and/or increased processing time) will be required of the MOL design in order to apply your pricing formula?
- (a) If you have and an increase in capacity appears to be required, what will the cost consequences of adoption of your proposed pricing formula be?
- (b) If you have not, why not?
- PB/OCA-T-100-2 Please confirm that your references to the “competitive advantage on the part of the Postal Service” and the extent to which your pricing proposal eliminates that advantage (e.g., OCA-T-100 at 21, lines 14-15) refers only to a Postal Service advantage related to postage rates and not other advantages that the Postal Service might have because of, for example, vertical integration of the Mailing Online service with postal services over which the USPS has a statutory monopoly.
- PB/OCA-T-100-3 With reference to your Table 1, please confirm that each of the subsidiary tables presented at page 27 of your testimony lists rates for the first ounce of First-Class mail with the exception of the 3/5B lines which have rates for Standard A flats.
- PB/OCA-T-100-4 How many total job-type/page-count and presort level tables would be required to reflect all of the rates that might result from your postal pricing proposal?
- (a) Please show how you calculated your answer to this interrogatory and provide any work papers associated with that calculation.
- PB/OCA-T-100-5 Would each of these job-type/page-count tables have to be updated quarterly to calculate the quarterly rate revisions that you recommend?
- PB/OCA-T-100-6 Have you made an estimate of the costs associated with whatever updating would be required to implement your recommended quarterly changes in job-type, page-count rates?

(a) If so, what is that estimate?

(b) If not, why not?

PB/OCA-T-100-7 Do you recommend that destination entry discounts as well as presort level discounts should be included in the calculation of "experience-based weighted average rates" OCA-T-100 at 28, lines 13-14?

(a) If so, would this require more job-type/page-count categories than contained in your answer to interrogatory PB/OCA-T-100-5?

(b) If not, why not?

PB/OCA-T-100-8 For First-Class mail, would each incremental ounce of weight require a separate lookup table for each of the categories of that mail?

PB/OCA-T-100-9 How would you create lookup tables for Standard A flat size mail to which the pound rate applies?

PB/OCA-T-100-10 Would each printing site charge the same postage rate without regard to the characteristics of mail at that site?

(a) If so, would further de-averaging to calculate individual postage rates for each site be more equitable to the mailers whose mail entered the postage stream from a particular site?

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: February 18, 1999

Ian D. Volner
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