

ORIGINAL

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

RECEIVED

FEB 19 2 33 PM '99

OFFICE OF THE SECRETARY

Mailing Online Service

)

Docket No. MC98-1

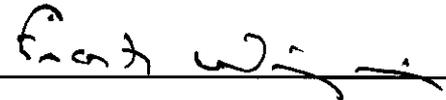
RESPONSE OF MAIL ADVERTISING SERVICE ASSOCIATION
INTERNATIONAL/PITNEY BOWES
WITNESS PRESCOTT TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/MASA/PB-T1-1)

The Mail Advertising Service Association International/Pitney Bowes hereby provides the response of witness Prescott to the following interrogatory of the Consumer Advocate: OCA/MASA/PB-T1-1, filed on February 12, 1999.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

By its attorneys:





RESPONSE OF MAIL ADVERTISING SERVICE ASSOCIATION
INTERNATIONAL/PITNEY BOWES
WITNESS PRESCOTT TO INTERROGATORIES
OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/MASA/PB-T1-1. Please refer to your testimony at page 10, lines 5-13.

- (a) Please define "mail preparation services."
- (b) Please define the "competitive market for mail preparation services."
- (c) Please confirm that some of the 62 percent of business diverted from "private competitive firms to the USPS' subcontractors" could be diverted from firms that prepare mail in-house as an adjunct to major business activities, such as insurance company policy statements. If you do not confirm, please explain.
- (d) Please provide any studies, reports or other evidence showing the proportion of the \$121 million of business during the experiment diverted from firms that prepare mail in-house.

OCA/MASA/PB-T1-1 Response:

- (a) The phrase "Mail preparation services" in my testimony refers to the physical production of documents to be mailed including any or all of the following: composition, printing, stapling, enveloping, selection of recipients, addressing, sorting, and placement of postage on the mailable item.
- (b) The phrase "competitive market for mail preparation services" in my testimony refers to those private companies that could compete for any of the services provided by Mailing Online.
- (c) Confirmed.
- (d) My analysis was based on data presented by the USPS. I am unaware of any data presented by the USPS that identifies the proportion of mail diverted from firms that prepare mail in-house.

DECLARATION

I, Roger C. Prescott, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

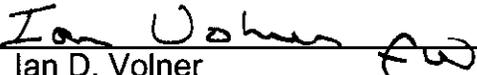
Roger C. Prescott

Date: February 19, 1999

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 19, 1999



Ian D. Volner