

ORIGINAL

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

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MAILING ONLINE SERVICE

Docket No. MC98-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
MAIL ADVERTISING SERVICE ASSOCIATION INTERNATIONAL
WITNESS JURGENA
(USPS/MASA-T2-1-8)


Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to Mail Advertising Service Association International witness Jurgena: USPS/MASA-T2-1-8.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

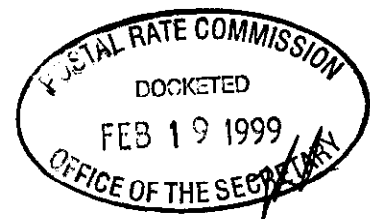
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

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Washington, D.C. 20260-1137
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February 19, 1999



USPS/MASA-T2-1. Please refer to your testimony at page 2, where you state that your firm “recently completed a 329 piece job for a large and important customer.” Please describe in detail the nature of that job, including, but not limited to: the size of the pieces; the nature of the pieces, including the use of color and the paper or stock type; the type of printing or other process used to produce the pieces; and the specific work your firm performed.

USPS/MASA-T2-2. What percentage of your customers' mailpieces pay single-piece rates?

USPS/MASA-T2-3. Are any of your customers' mailpieces entered at discounted postage rates? If so, what discount levels are used and what proportion of pieces your firm prepares are entered at each discount rate? If not, at what rates is your customers' mail entered?

USPS/MASA-T2-4. Would you, or your customers, be willing to forgo possible higher discounts for which your mailings might qualify if entered into the mail in the traditional way, in return to access to the mail categories (including waiver of the volume minimums) now applicable to Mailing Online?

USPS/MASA-T2-5. At page 4 you state that many of your customers are large corporations that “often send small mailings, and they have sufficient sophistication and technical ability to provide their mailings directly to USPS electronically without difficulty.” Do these customers' mailpieces typically qualify for discounts deeper than

automation basic? If so, would such customers be prepared to forgo the deeper discounts for which they generally qualify to use Mailing Online?

USPS/MASA-T2-6.

- (a) Have you ever used Mailing Online?
- (b) Have you ever tried to use Mailing Online?
- (c) Have you visited the Mailing Online website?

USPS/MASA-T2-7. On page 6, you refer to the problem of address lists that contain "addresses with cities that do not match states, [ZIP C]odes that are wrong, and other such problems." Please explain your understanding of how Mailing Online deals with these problems.

USPS/MASA-T2-8. On page 7 you discuss the issue of change in your firm's relationship with the Postal Service. Please state specifically what changes in your relationship with the Postal Service you have experienced since the initiation of Mailing Online.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Scott L. Reiter", written over a horizontal line.

Scott L. Reiter

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