

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 SCHUH
(USPS/MASA-T1-1-6)

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 Schuh:
USPS/MASA-T1-1-6.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

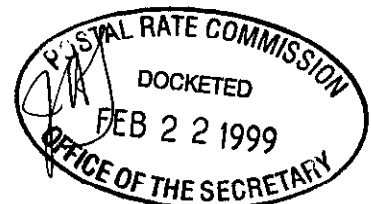
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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February 22, 1999



USPS/MASA-T1-1. Do your company's capabilities include varying each copy of a document to contained personalized information (e.g., mail merge)?

USPS/MASA-T1-2. Please refer to your discussion at page 3 of your testimony concerning your company's relationship with the Postal Service.

- (a) Please cite specific examples of any change you feel has taken place.
- (b) Please specifically address whether the Postal Service has stopped or curtailed its efforts you mention, including the "Business Partners" program and participation in Postal Customer Councils.

USPS/MASA-T1-3. Does your company prepare materials for its customers that are disseminated other than by the Postal Service?

USPS/MASA-T1-4. On page 4 of your testimony you refer to the "basic production criteria" for Mailing Online. Please define specifically what you mean by these criteria and explain whether they include digital printing and desktop software for document production.

USPS/MASA-T1-5. You state that the 62 percent of Mailing Online volume that is estimated to come from existing users of direct mail will come from "current clients of my company and others that service this market."

- (a) On what basis do you believe that the mailers of this 62 percent are current clients of your company and similar companies?
- (b) Please refer to the testimony of witnesses Wilcox and Campanelli, filed on behalf of the Postal Service, where they indicate that before Mailing Online,

they prepared and mailed direct mailings themselves. How do you reconcile their testimony with your statement that direct mailing which migrates to Mailing Online will come from your company or similar companies?

USPS/MASA-T1-6. Please refer to your testimony at page 5, regarding the information you solicited from other firms concerning the percentage of their jobs that are less than 5,000 pieces.

- (a) Are all of these pieces mailed? If not, what percentage is mailed?
- (b) Do you project that all of this volume will shift to Mailing Online? If not, what percentage do you believe will shift and what is the basis for your estimate?
- (c) Do you believe volume will shift to Mailing Online in cases where the basic automation postage rate charged by Mailing Online is higher than the deeper discounts available to you and your customers? How does this affect your estimate provided in part (b) above?

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.



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