

ORIGINAL

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

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MAILING ONLINE SERVICE )  
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Docket No. MC98-1

RESPONSE OF MAIL ADVERTISING SERVICE ASSOCIATION  
INTERNATIONAL WITNESS JURGENA TO INTERROGATORIES OF  
THE UNITED STATES POSTAL SERVICE  
(USPS/MASA-T2-1-8)

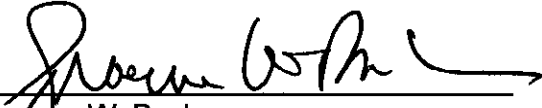
The Mail Advertising Service Association International hereby provides the response of  
witness Jurgena to the following interrogatories of the United States Postal Service:

USPS/MASA-T2-1-8, filed on February 19, 1999.

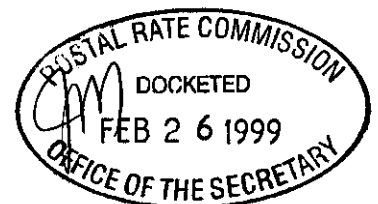
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

By its attorneys:

  
\_\_\_\_\_  
Graeme W. Bush  
Martin S. Himeles, Jr.  
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202/778-1800

February 26, 1999



RESPONSE OF MAIL ADVERTISING SERVICE ASSOCIATION  
INTERNATIONAL WITNESS JURGENA TO INTERROGATORIES OF  
THE UNITED STATES POSTAL SERVICE

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-T2-1 Response:**

The nature of this particular job for this customer was the printing and mailing of 329 personalized letters. Specifically, we printed personalized letters in black on 8 1/2 by 11 inch white customer-provided letterhead. The letterhead contained the customer's logo and typical letterhead information printed in black. The customer provided an electronic copy of an address list, as well as a faxed copy of the list with annotations by hand to indicate to which of the addresses on the list the letter should be mailed. Our employees then sorted the selected addresses alphabetically by company and split them in half. The letters were printed on a laser printer and half of the addresses were printed by inkjet printer in black ink on white envelopes that matched the customer's letterhead. The corresponding letters were inserted in these envelopes and the envelopes were sealed and sent by First Class Mail. For the other half of the addresses, we prepared UPS shipping documents using the customer's account and sent the letters in UPS second day air letter packs. On approximately four subsequent occasions, the customer sent by e-mail several additional addresses to which we sent personalized letters.

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

**USPS/MASA-T2-2 Response:**

I do not know the precise percentage of our customers' mailpieces that pay single-piece rates. I believe the percentage is less than fifty percent but not insignificant.

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-T2-3 Response:**

Some of our customers' mailpieces are entered at discounted postage rates. The discount levels range from the single piece basic rates (i.e., no discount) to carrier route/DDU, and include all or most discounted rates in between. I do not know the proportion of the pieces we prepare that are entered at each discount rate.

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-T2-4 Response:**

The portion of the question beginning with "in return" is ambiguous; I assume that you intend to ask whether my company or my customers would be willing to forego possible higher discounts in order to use Mailing Online. I believe that some of my customers would be willing to forego possible higher discounts to use Mailing Online. My company would not use Mailing Online as long as it is in direct competition with us.

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-T2-5 Response:**

The quoted testimony at page 4 referred to many of our customers "for mailings that are under 5,000 pieces." These customers' mailings that are under 5,000 pieces occasionally, but infrequently, qualify for discounts deeper than automation basic. I believe that some of my customers would forego deeper discounts, in the infrequent instances when they are available, 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-T2-6 Response:**

- (a) No.
- (b) No.
- (c) No.

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-T2-7 Response:**

The quoted testimony appears on page 5 of my testimony. My belief is that the Postal Service does not send mail to addresses with such errors, and notifies customers that certain address on their mailing lists were not used.

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.


**USPS/MASA-T2-8 Response:**

Mailing Online has not yet been initiated in my area. As a result, I have not yet experienced a change in our relationship with the Postal Service.

**DECLARATION**

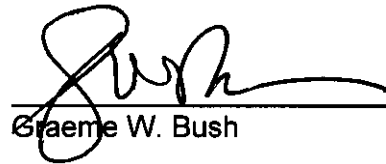
I, Richard Jurgena, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Date: February 25, 1999

A handwritten signature in cursive script, appearing to read "R. Jurgena", written over a horizontal line.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Response of Mail Advertising Service Association International Witness Jurgena to Interrogatories of the United States Postal Service (USPS/MASA-T2-1-8) was served in accordance with Rule 12 of the Rules of Practice and POR No. MC98-1/4 this 26th day of February, 1999.

  
Graeme W. Bush