

ORIGINAL

RECEIVED  
Feb 26 12 52 PM '99  
BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

MAILING ONLINE SERVICE

Docket No. MC98-1

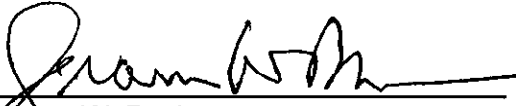
RESPONSE AND OBJECTIONS OF MAIL ADVERTISING SERVICE ASSOCIATION  
INTERNATIONAL TO INTERROGATORY OF  
THE UNITED STATES POSTAL SERVICE  
(USPS/MASA-1)

The Mail Advertising Service Association International hereby provides its response and objections to the following interrogatory of the United States Postal Service: USPS/MASA-1, filed on February 19, 1999.

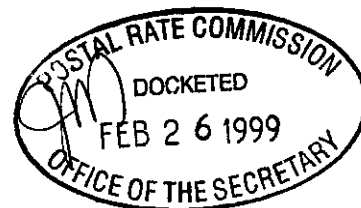
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

By its attorneys:

  
\_\_\_\_\_  
Graeme W. Bush  
Martin S. Himeles, Jr.  
Zuckerman, Spaeder, Goldstein,  
Taylor & Kolker, L.L.P.  
1201 Connecticut Avenue, N.W.  
Washington, D.C. 20036  
202/778-1800

February 26, 1999



RESPONSE AND OBJECTIONS OF MAIL ADVERTISING SERVICE ASSOCIATION  
INTERNATIONAL TO INTERROGATORY OF  
THE UNITED STATES POSTAL SERVICE

USPS/MASA-1.

- (a) Has MASA undertaken any survey of its membership regarding whether they favor or disfavor Mailing Online? If so, please provide the survey instrument, all responses, and any tabulations derived therefrom. If not, why not? Please provide a complete explanation.
- (b) Have any MASA members expressed opinions to MASA or its leadership regarding Mailing Online via telephone conversations? If so, please provide a summary of those calls and any retained documentation regarding their substance and participants.
- (c) Have any MASA members expressed opinions to MASA or its leadership regarding Mailing Online via email or fax? If so, please provide copies of each such communication.
- (d) Have any MASA members expressed opinions to MASA or its leadership regarding Mailing Online via letter or correspondence? If so, please provide copies of each such communication.
- (e) Has MASA communicated with its membership regarding Mailing Online? If so, please provide copies of each such communication. If not, why not?

**USPS/MASA-1 Response:**

- (a) No. The views of MASA's volunteer leaders, who are representative of its members, as well as the many members who called MASA about Mailing Online, were sufficiently clear that a formal survey by MASA of its membership was not considered necessary.
- (b) Many MASA members have called MASA and expressed opinions concerning Mailing Online. No written log or other records of the calls were maintained. The calls were so numerous that it is not possible to summarize each of them. Generally, MASA members expressed their concerns about and opposition to Mailing Online. The views expressed in the testimony of witnesses Schuh and Jurgena, as well as those reflected in the documents that will be produced in response to item 1(c), are generally representative of the views expressed by those MASA members who called MASA.
- (c) Yes. MASA objects to the production of the documents called for to the extent they contain privileged, proprietary or commercially sensitive information, the disclosure of which would be likely to cause commercial harm and would not

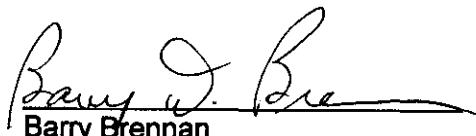
lead to the discovery of relevant or admissible evidence. Notwithstanding the objection, MASA will produce responsive documents in its possession redacted to eliminate references to senders and recipients and any other identifying information.

- (d) Yes. MASA will produce a copy of the one letter it has received from a member regarding Mailing Online, redacted in accordance with MASA's objections.
- (e) Yes. MASA will produce copies of its communications with its membership regarding Mailing Online.

**DECLARATION**

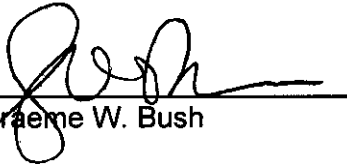
I, Barry Brennan, declare under penalty of perjury that I am the Director of Postal Affairs of Mail Advertising Service Association International, and that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Date: Feb. 24 1999

  
Barry Brennan

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Response and Objections of Mail Advertising Service Association International to Interrogatory of the United States Postal Service (USPS/MASA-1) 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