

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

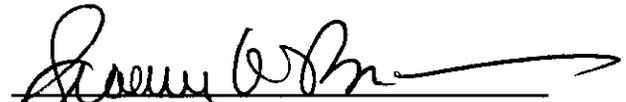
RESPONSE OF MAIL ADVERTISING SERVICE ASSOCIATION
INTERNATIONAL WITNESS JURGENA TO FOLLOW-UP INTERROGATORY
AND REQUEST FOR PRODUCTION OF DOCUMENTS OF
THE UNITED STATES POSTAL SERVICE
(USPS/MASA-T2-9)¹

The Mail Advertising Service Association International hereby provides the response of witness Jurgena to the following interrogatory and request for production of documents of the United States Postal Service: USPS/MASA-T2-9, filed on March 5, 1999.

Each 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

March 12, 1999

¹ The USPS erroneously numbered this interrogatories USPS/MASA-T1-9. Witness Jurgena's testimony is MASA-T-2, not MASA-T-1. This response corrects this error.



RESPONSE OF MAIL ADVERTISING SERVICE ASSOCIATION
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USPS/MASA-T2-9.

- (a) Please confirm that you sent the attached email (page M00115 from the documents provided to the Postal Service on March 1, 1999, in response to USPS/MASA-1), asking: "Does anybody believe they will lose clients to this service if the Post Office goes forward with it? Can you give me any specific (no names of course) examples and why you think they might go to this instead of using your services."
- (b) Did you receive any responses to this solicitation? If so, please provide them and explain why those responses were not provided to the Postal Service with the other documents provided on March 1.

USPS/MASA-T2-9 Response:

- (a) Confirmed.
- (b) I received one response. A copy of the response has previously been produced by MASA, and is numbered M 00056.

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: _____

DECLARATION

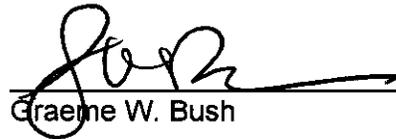
I, Richard Jurgena, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Date: March 12, 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 Follow-Up Interrogatory And Request For Production Of Documents Of The United States Postal Service was served upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice and POR No. MC98-1/4 this 12th day of March, 1999.



Graeme W. Bush