

ORIGINAL

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

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Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS: DANIEL STIREWALT
(OCA/USPS-T3-35)
(September 24, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

Respectfully submitted,



Gail Willette
Acting Director
Office of the Consumer Advocate



Emmett Rand Costich
Acting Assistant Director



OCA/USPS-T3-35. Please refer to Tr. 3/719-37, 767-75. The first group of transcript pages contains the attachments to your response to interrogatory OCA/USPS-T3-1, which constitutes an expansion of your library reference USPS-LR-1/MC98-1. The second group of transcript pages contains oral cross-examination of you relating to the first group of pages.

- a. At page 767 of the transcript you state, "I believe in my calculation I used postscript for both [mail merge and non-mail merge jobs]" Is this a correct statement with respect to page 722 of the transcript? If not, what should the correct statement be? Does the calculation of "Number of Bytes per Business Day" appearing at page 721 reflect current practice? If not, please conform your cost model to current practice.
- b. Please confirm that the actual calculation in your electronic spreadsheet of "Number of Bytes per Business Day" appearing at page 721 reflects the following formula:

$$\begin{aligned} & \text{PCS/DAY} * \text{BYTES/PAGE} * \% \text{ MAIL MERGE} * \text{COMP FACT} * \text{SESSIONS/DAY} * \\ & \text{BYTES/PAGE} * \% \text{ NON MAIL MERGE} * \text{COMP FACT} = \\ & 1.15721\text{E}+15 \end{aligned}$$

If you do not confirm, please state the formula you used in words and provide a rationale for that formula.

- c. Please confirm that the formula you used to calculate "Number of Bytes per Business Day" is incorrect. In particular, the factor "SESSIONS/DAY" is unnecessary, the "*" following the first "COMP FACT" should be "+", there should be a factor called "PAGES/PC" on the first line shown above, there should be

separate "BYTES/PAGE" for mail merge and non-mail merge jobs, and there should be a factor "PCS/DAY * PAGES/PC" in the second line above yielding a value for "Number of Bytes per Business Day" of 8.12851E+9. If you do not confirm, please show that the units associated with your figure of 1.15721E+15 are in fact PCS/DAY and not $(PCS * BYTES^2 * SESSIONS) / (DAY^2 * PAGES^2)$.

- d. At page 768 of the transcript you state, "I don't have a complete and full understanding of all the processing steps that occur within the processor; that is, what the software performs upon the data. But I do know that . . . the files could be in a PDF format or a postscript format." For purposes of your cost model, have you properly accounted for all situations in which different file formats may be used? If not, please correct your library reference.
- e. At page 772 of the transcript you state, "At one part of the process they're both in PDF format, and at a later point in the process, they both are in Postscript format." Please confirm that in your cost model (e.g., Tr. 3/722-23), mail merge jobs are in PDF format while non-mail merge jobs are in Postscript format at the *same* "point in the process." Please state what the current actual practice is with respect to the format used to store files associated with mail merge and non-mail merge jobs. Please conform your cost model to current actual practice.
- f. At page 773 of the transcript you state, "The PDF should be non-mail merge job. And the Postscript should be mail merge jobs It's an error in the heading." Please confirm that if one changes the heading at page 723 of the transcript from "Postscript Files For Non-Mail Merge Jobs" to PDF, then one must also

change the line "Average Bytes per Page in Postscript format" (30720) to PDF (5020). Please conform your cost model to your statement at page 773 or explain what the correct headings and values should be.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


Emmett Rand Costich
Attorney

Washington, D.C. 20268-0001
September 24, 1998