

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Mailing Online Experiment)

Docket No. MC2000-2

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS: LEE GARVEY (OCA/USPS-T1-1-6)
(December 10, 1999)

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.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies *attached to responses of these interrogatories*. If production of copies is infeasible due to the volume of material or otherwise, production should be made for inspection at the Office of the Consumer Advocate, 1333 H Street, N.W., Washington, D.C. 20268-0001, during the hours of 8:00 a.m. to 4:30 p.m.

If a privilege is claimed with respect to any data or documents requested herein, the party to whom this discovery request is directed should provide a Privilege Log, as required in Presiding Officer's Rulings C99-1/9 and 11. Specifically, "the party shall make the claim expressly and shall describe the nature of the documents,

communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection." F.R.C.P. 26(b)(5).

The term "documents" includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term "documents" also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, tapes and recordings used in data processing together with any written material necessary to understand or use such punch cards, discs, tapes or other recordings.

"All documents" means each document, as defined above, that can be located, discovered or obtained by reasonable diligent efforts, including without limitation all documents possessed by: (a) you or your counsel; or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.


"Communications" includes, but is not limited to, any and all conversations, meetings, discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

"Relating to" means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The term "workpapers" shall include all backup material whether prepared manually,

mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be or have not been provided.

Respectfully submitted,


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OCA/USPS-T1-1. Please refer to your testimony, Appendix A, the "Experimental Data Collection Plan." Does the Postal Service plan to collect and periodically report the advertising costs of Mailing Online during the experiment as part of the "Experimental Data Collection Plan?" Please explain.

OCA/USPS-T1-2. Please refer to your testimony, Appendix A, the "Experimental Data Collection Plan."

- a. Please confirm that the mailing statement, Form 3600, will be the primary source of documentation for Mailing Online pieces entered as First-Class Mail. If you do not confirm, please explain.
- b. Please confirm that the mailing statement, Form 3602, will be the primary source of documentation for Mailing Online pieces entered as Standard (A) Mail. If you do not confirm, please explain.
- c. Please confirm that the "USPS Qualification Reports" will be a primary source of documentation for Mailing Online pieces entered as First-Class or Standard (A) Mail. If you do not confirm, please explain.
- d. Please confirm that San Mateo prepares in electronic form the mailing statements and USPS Qualification Reports identified in parts a., b. and c. of this interrogatory. If you do not confirm, please explain.
- e. Please confirm that the Postal Service will be able to preserve and retrieve the mailing statements and USPS Qualification Reports prepared in electronic form identified in parts a., b. and c. of this interrogatory. If you do not confirm, please explain.

- f. Please confirm that the Postal Service will collect the printed mailing statements and USPS Qualification Reports identified in parts a., b. and c. of this interrogatory that accompany the Mailing Online pieces entered at specified mail processing facilities. If you do not confirm, please explain.
- g. Please explain how the Postal Service intends to use the electronic and printed mailing statements and USPS Qualification Reports identified in parts e. and f. of this interrogatory to provide the data identified in the "Experimental Data Collection Plan."

OCA/USPS-T1-3. In Docket No. MC98-1, please refer to your response to OCA/USPS-T1-72.

- a. Please confirm that the Version 3 system software under development will include the "Mail.dat opportunity." If you do not confirm, please explain.
- b. Please confirm that the "Mail.dat opportunity" will permit the association of mailing statements with batch numbers. If you do not confirm, please explain.
- c. Please explain how the Postal Service intends to use the "Mail.dat opportunity" to provide the data identified in the "Experimental Data Collection Plan."

OCA/USPS-T1-4. Please refer to your response to OCA/USPS-T1-45(f) in Docket No. MC98-1.

- a. On the first day of the experiment, in the case of First-Class Mail, please confirm that there are 62 job-types, and that the page-count can be equal to or less than 48 pages. If you do not confirm, please explain.

- b. On the first day of the experiment, in the case of Standard (A) Mail (Regular), please confirm that there are 62 job-types, and that the page-count can be equal to or less than 48 pages. If you do not confirm, please explain.
- c. On the first day of the experiment, please confirm that Standard (A) Mail (Nonprofit), and Priority Mail and Express Mail service will not be offered to customers. If you do not confirm, please explain.

OCA/USPS-T1-5. Please refer to your testimony at page 2, lines 18-20, where it states, "The single piece First-Class Mail rate will be offered only as an option for mailpieces with addresses which cannot be standardized."

- a. Will the Postal Service or customers exercise this option? If customers do so, will they be informed of the amount of single piece First-Class postage separate from the First-Class or Standard (A) automation basic postage charge for their other Mailing Online pieces? Please explain.
- b. Please explain what is meant by the phrase "mailpieces with address that cannot be standardized."

OCA/USPS-T1-6. Please refer to the response of OCA witness Callow to PB/OCA-T100-8 and PB/OCA-T100-9 in Docket No. MC98-1.

- a. In PB/OCA-T100-8, Attachment 1, please confirm that the First-Class Mail rates listed in Attachment 1 for Mailing Online letter-size, legal-size and newsletter-size pieces by job-type and page-count are correct. If you do not confirm, please

- explain and provide the correct First-Class Mail rates for letter-size, legal-size and newsletter-size pieces by job-type and page-count.
- b. In PB/OCA-T100-9, Attachment 1, please confirm that the Standard (A) Mail rates listed in Attachment 1 for Mailing Online letter-size, legal-size and newsletter-size pieces by job-type and page-count are correct for pieces weighing 3.2985 ounces or less. If you do not confirm, please explain and provide the correct Standard (A) Mail rates for letter-size, legal-size and newsletter-size pieces by job-type and page-count for pieces weighing 3.2985 ounces or less.
- c. In PB/OCA-T100-9, Attachment 2, please confirm that the Standard (A) Mail rates listed in Attachment 2 for Mailing Online letter-size, legal-size and newsletter-size pieces by job-type and page-count are correct for pieces weighing more than 3.2985 ounces. If you do not confirm, please explain and provide the correct Standard (A) Mail rates for letter-size, legal-size and newsletter-size pieces by job-type and page-count for pieces weighing more than 3.2985 ounces.

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.


Stephanie Wallace

Washington, D.C. 20268-0001
December 10, 1999