

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

RECEIVED  
Dec 17 1 28 PM '99  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

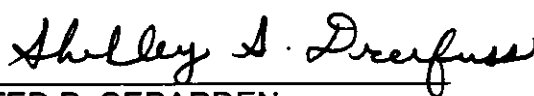
Mailing Online Experiment )

Docket No. MC2000-2

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: MICHAEL K. PLUNKETT (OCA/USPS-T5-1-3)  
(December 17, 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. Instructions included with OCA interrogatories OCA/USPS-T1-1-6 to witness Lee Garvey dated December 10, 1999, are hereby incorporated by reference.

Respectfully submitted,



TED P. GERARDEN  
Director  
Office of the Consumer Advocate

SHELLEY S. DREIFUSS  
Attorney

1333 H Street, N.W.  
Washington, D.C. 20268-0001  
(202) 789-6830; Fax (202) 789-6819

OCA/USPS-T5-1. Please refer to Exhibit D in your testimony, page 27, at line 6 in the "Total" column. Please confirm that the amount \$29,083,518 should be changed to \$30,303,918. If you do not confirm, please explain.

OCA/USPS-T5-2. Please refer to Exhibit E in your testimony, page 29, at line 5, "Information System Costs." Please confirm that the fee for Information Systems Costs for "First Class" and "Standard A" should be \$0.002 and \$0.008, respectively. If you do not confirm, please explain.

OCA/USPS-T5-3. Please refer to your testimony in this proceeding and your testimony (USPS-T-5) in Docket No. MC98-1. Please identify any assumptions or methodological approaches in your testimony in this proceeding that are different from the assumptions made or methodological approaches used in your testimony in Docket No. MC98-1. Please explain the significance of, and your rationale for, any changes identified.

#### 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 17, 1999

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

RECEIVED

Dec 17 1 28 PM '99

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Mailing Online Experiment

)

Docket No. MC2000-2

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: LEE GARVEY (OCA/USPS-T1-7-11)  
(December 17, 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. Instructions included with OCA interrogatories OCA/USPS-T1-1-6 to witness Lee Garvey dated December 10, 1999, are hereby incorporated by reference.

Respectfully submitted,



TED P. GERARDEN

Director

Office of the Consumer Advocate

SHELLEY S. DREIFUSS  
Attorney

1333 H Street, N.W.  
Washington, D.C. 20268-0001  
(202) 789-6830; Fax (202) 789-6819

OCA/USPS-T1-7. Please refer to your testimony at page 16, lines 4-6, concerning automation basic rates for Mailing Online during the experiment. According to the Postal Service, 25 print sites are expected to be in operation by the end of the experiment. Each print site will house a dedicated server to receive Mailing Online mailings processed for printing by the Postal Service's processing center.

Assume, however, that a competitive hybrid mail service contracts with each print site operator to install another server identical to the Postal Service's server at each print site and the operator charges the same printing fees. Also assume that on the same day both the Postal Service and the competitive hybrid mail service transmit to the print site operator identical small-volume mailings (i.e., having the same volume below the threshold minimum, job-type characteristics, and page count) that cannot be batched. Please confirm the only difference between the two mailings would be the postage paid upon entry. That is, that all of the Postal Service's Mailing Online mailpieces would be charged the Automation Basic rate, while the mailpieces of the competitive hybrid mail service provider would be charged rates for which the mailpieces qualify (i.e., the single piece rate). If you do not confirm, please explain.

OCA/USPS-T1-8. Please refer to your testimony at page 16, lines 4-6, concerning automation basic rates for Mailing Online during the experiment, and your response to the Commission's Notice of Inquiry No. 1, Issue 3, in Docket No. MC98-1.

- a. Please confirm that during the experiment the Postal Service will license or certify competitive hybrid mail service providers that are "functional equivalents" of Mailing Online. If you do not confirm, please explain.

- b. Please confirm that competitive hybrid mail service providers so licensed or certified by the Postal Service would be able to offer First-Class Mail and Standard (A) Mail Automation Basic rates to small-volume mailings (i.e., mailings with volumes below the minimum requirements of the respective mail classes). If you do not confirm, please explain.

OCA/USPS-T1-9. Please refer to the section of your testimony entitled "VI. Batching," on pages 14 and 15.

- a. Are the terms "batching," and the terms "merge" and "merger" as used in this section synonymous? Please define (and distinguish each term, if necessary).
- b. On the first day of the experiment, within First-Class Mail and within Standard (A) Mail, will the Version 3 system software be able to batch non-merge mail documents? Please explain. If the Version 3 system software will not be able to batch non-merge mail documents on the first day of the experiment, please explain when during the experiment that capability will exist.

OCA/USPS-T1-10. Please refer to the section of your testimony entitled "VI. Batching," on pages 14 and 15.

- a. On the first day of the experiment, within First-Class Mail and within Standard (A) Mail, will the Version 3 system software be able to batch all letter-shaped 1) merge mail documents having the same job-type and page count and 2) non-merge mail documents having the same job-type and page count? Please explain. If the Version 3 system software will not be able to batch such letter-

shaped merge mail and non-merge mail documents on the first day of the experiment, please explain when during the experiment that capability will exist.

- b. On the first day of the experiment, within First-Class Mail and within Standard (A) Mail, will the Version 3 system software be able to batch all letter-shaped 1) merge mail documents having the same job-type but different page counts and 2) non-merge mail documents having the same job-type but different page counts? Please explain. If the Version 3 system software will not be able to batch such letter-shaped merge mail and non-merge mail documents on the first day of the experiment, please explain when during the experiment that capability will exist.
- c. On the first day of the experiment, within First-Class Mail and within Standard (A) Mail, will the Version 3 system software be able to batch all letter-shaped 1) merge mail documents having the same page count but different job-types and 2) non-merge mail documents having the same page count but different job-types? Please explain. If the Version 3 system software will not be able to batch such letter-shaped merge mail and non-merge mail documents on the first day of the experiment, please explain when during the experiment that capability will exist.
- d. On the first day of the experiment, within First-Class Mail and within Standard (A) Mail, will the Version 3 system software be able to batch all flat-shaped 1) merge mail documents having the same job-type and page count and 2) non-merge mail documents having the same job-type and page count? Please explain. If the Version 3 system software will not be able to batch such flat-shaped merge mail and non-merge mail documents on the first day of the experiment, please explain when during the experiment that capability will exist.

- e. On the first day of the experiment, within First-Class Mail and within Standard (A) Mail, will the Version 3 system software be able to batch all flat-shaped 1) merge mail documents having the same job-type but different page counts and 2) non-merge mail documents having the same job-type but different page counts?  
Please explain. If the Version 3 system software will not be able to batch such flat-shaped merge mail and non-merge mail documents on the first day of the experiment, please explain when during the experiment that capability will exist.
- f. On the first day of the experiment, within First-Class Mail and within Standard (A) Mail, will the Version 3 system software be able to batch all flat-shaped 1) merge mail documents having the same page count but different job-types and 2) non-merge mail documents having the same page count but different job-types?  
Please explain. If the Version 3 system software will not be able to batch such flat-shaped merge mail and non-merge mail documents on the first day of the experiment, please explain when during the experiment that capability will exist.
- g. On the first day of the experiment, within First-Class Mail and within Standard (A) Mail, will the Version 3 system software be able to batch all letter-shaped merge mail and non-merge mail documents together? Please explain. If the Version 3 system software will not be able to batch all letter-shaped merge mail and non-merge mail documents together on the first day of the experiment, please explain when during the experiment that capability will exist.
- h. On the first day of the experiment, within First-Class Mail and within Standard (A) Mail, will the Version 3 system software be able to batch all flat-shaped merge mail and non-merge mail documents together? Please explain. If the Version 3

system software will not be able to batch all flat-shaped merge mail and non-merge mail documents together on the first day of the experiment, please explain when during the experiment that capability will exist.

OCA/USPS-T1-11. Please refer to your testimony at pages 9-11, concerning the volume of Mailing Online mail pieces during the market test, and the testimony of OCA witness Callow (OCA-T-100), Table 1, at page 27, in Docket No. MC98-1. Table I in OCA-T-100 contains Mailing Online "look-up" tables for First-Class Mail for the collection of volume data by job-type, page-count and presort level. The same number of "look-up" tables would exist for Standard (A) Mail. See Docket No. MC98-1, PB/OCA-T100-4. This interrogatory seeks the Mailing Online volume data requested by the "look-up" tables, as modified in parts a. and b. below.

- a. For each First-Class Mail "look-up" table, please provide the daily volume by job-type, page-count and presort level during the market test for
  - i. merge mail documents submitted by customers in quantities of 1) fewer than 500 pieces and 2) 500 or more pieces, and
  - ii. non-merge mail documents submitted by customers in quantities of 1) fewer than 500 pieces and 2) 500 or more pieces.
- b. For each Standard (A) Mail "look-up" table, please provide the daily volume by job-type, page-count and presort level during the market test for
  - i. merge mail documents submitted by customers in quantities of 1) fewer than 200 pieces and 2) 200 or more pieces, and



- ii. non-merge mail documents submitted by customers in quantities of fewer than 500 pieces and 500 or more pieces.

### 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 17, 1999