

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

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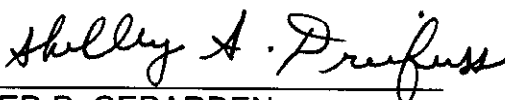
Mailing Online Experiment )

Docket No. MC2000-2

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: LEE GARVEY (OCA/USPS-T1-12-18)  
(December 22, 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,



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OCA/USPS-T1-12. Please refer to your response to OCA/USPS-T1-2(d).

- a. Please identify and describe the “component of the Mailing Online system” referenced in your response.
- b. Please explain what “component” (or components) of the Mailing Online system currently reside at the San Mateo data center. Please explain what “component” (or components) of the Mailing Online system (other than the component identified in part a. of this interrogatory) are currently scheduled to reside at the San Mateo data center.

OCA/USPS-T1-13. Please refer to your response to OCA/USPS-T1-2(g). Please explain how the Postal Service used 1) the electronic mailing statements, Forms 3600 and 3602, and the USPS Qualification Reports, and 2) the printed mailing statements and USPS Qualification Reports to prepare the Accounting Period Reports and the Bi-weekly Reports during the Market Test.

OCA/USPS-T1-14. Please refer to your response to OCA/USPS-T1-4(a), and the testimony of witness Poellnitz (USPS-T-2) at page 9, lines 1-7.

- a. Are the terms “binding options,” as used in your response to OCA/USPS-T1-4(a), and the term “finishing options,” as used in the testimony of witness Poellnitz, synonymous? Please define (and distinguish each term, if necessary).
- b. Please refer to footnote 15 in the testimony of witness Poellnitz, where it states, “Finishers are required only for finishing 11x17 impressions.” Your response to OCA/USPS-T1-4(a) states that there are “3 possible binding options - stapled,

not stapled or tape binding” for letter and legal size pages. Please reconcile your response with the statement of witness Poellnitz in footnote 15 quoted above. Please coordinate your response with the response of witness Poellnitz to OCA/USPS-T2-3.

OCA/USPS-T1-15. Please refer to your response to OCA/USPS-T1-5. Will the single-piece First-Class Mail rate be paid on

- a. First-Class mailpieces with addresses that cannot be standardized?
- b. Standard (A) mailpieces with addresses that cannot be standardized?
- c. Nonprofit mailpieces with addresses that cannot be standardized?

OCA/USPS-T1-16. Please refer to your response to OCA/USPS-T1-6, and your response to OCA/USPS-T1-4(a), where it states, “Newsletter size - 11” x 17” - paper limit the page count to 24 pages.”

- a. For First-Class Mail, please confirm that the total number of job-type/page-count batches equals 2,928 ((30 letter-size job types x 48 page count) + (30 legal-size job types x 48 page count) + (2 newsletter-size job types x 24 page count)). If you do not confirm, please explain.
- b. For Standard (A) Mail, please confirm that the total number of job-type/page-count batches equals 2,928 ((30 letter-size job types x 48 page count) + (30 legal-size job types x 48 page count) + (2 newsletter-size job types x 24 page count)). If you do not confirm, please explain.

- c. In PB/OCA-T100-8, Attachment 1, in Docket No. MC98-1, please refer to the columns headed "BI-BJ/1-48" and "Rates (cents)."
- i. Please confirm that the heading for the column "BI-BJ/1-48" should be changed to "BI-BJ/1-24" and the last four cells of the column should be deleted. If you do not confirm, please explain.
  - ii. Please confirm that the last cell of column headed "Rates (cents)" should be deleted. If you do not confirm, please explain.
- d. In PB/OCA-T100-9, Attachment 2, in Docket No. MC98-1, please refer to the columns headed "BI-BJ/8-48," "Weight per Piece (oz.), Newsletter-size," and "Automation Flats, Rates (cents), Nsltr. Size" (footnote omitted).
- i. Please confirm that the heading for the column "BI-BJ/8-48" should be changed to "BI-BJ/8-24" and the last 24 cells of the column should be deleted. If you do not confirm, please explain.
  - ii. Please confirm that the last 24 cells of column headed "Weight per Piece (oz.), Newsletter-size" should be deleted. If you do not confirm, please explain.
  - iii. Please confirm that the last 24 cells of column headed "Automation Flats, Rates (cents), Nsltr. Size" (footnote omitted) should be deleted. If you do not confirm, please explain.

OCA/USPS-T1-17. Please refer to your testimony at page 16, lines 1-4, and your rebuttal testimony (USPS-RT-1) at page 4, lines 15-18, in Docket No. MC98-1 concerning the OCA's proposal for Mailing Online. Also, please refer to Table I and the

pricing formula (Equation 1) in section IV.B. of OCA witness Callow's testimony (OCA-T-100) in Docket No. MC98-1.

- a. Please identify all actions that would need to be taken by the Mailing Online system developer and the Postal Service to implement a production system of the pricing formula (Equation 1).
- b. Please provide the total estimated time necessary to implement a production system of the pricing formula (Equation 1).
- c. Please provide the total estimated time necessary to implement a production system if the pricing formula (Equation 1) were modified as follows:

$$D = x$$

- d. Please provide the total estimated time necessary to implement a production system if the pricing formula (Equation 1) were modified as shown in part c. of this interrogatory, and the total number of job-type/page-count "look-up" tables were reduced to 2,928 ((30 letter-size job types x 48 page count) + (30 legal-size job types x 48 page count) + (2 newsletter-size job types x 24 page count)) in First -Class Mail and Standard (A) Mail, respectively.
- e. Please provide the total estimated time necessary to implement a production system if the pricing formula (Equation 1) were modified as shown in part c. of this interrogatory, and the total number of job-type/page-count "look-up" tables were reduced to 1,008 ((10 letter-size job types x 48 page count) + (10 legal-size job types x 48 page count) + (2 newsletter-size job types x 24 page count)) in First -Class Mail and Standard (A) Mail, respectively.

Note: The 10 letter-size and 10 legal-size job-types assumes there will be no binding options for letter-size and legal-size documents, consistent with the testimony of witness Poellnitz. See USPS-T-2 at 9, footnote 15. The number of letter and legal job-types is computed as follows:

Letter & legal	2 possible plex options - simplex or duplex
	$\underline{x 2}$ possible paper sizes - letter or legal
	4
	$\underline{x 5}$ possible color options - black, red, green, blue, magenta
	20

OCA/USPS-T1-18. Please refer to your testimony at pages 9-11, concerning customer volumes during the Market Test. Please provide the accumulated volumes by job-type by page-count by depth of sort from the USPS Qualification Reports during the Market Test.

#### 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 22, 1999