

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

**MAIL ADVERTISING SERVICE ASSOCIATION INTERNATIONAL  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: LIM (MASA/USPS-T3-1-7)  
(December 28, 1999)**

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, Mail Advertising Service Association International ("MASA") hereby submits interrogatories to United States Postal Service witness Chong Bum Lim. For purposes of these interrogatories, "MOL" refers to the MOL Service that is the subject of these proceedings.

**INTERROGATORIES**

MASA/USPS-T3-1. Referring to your testimony at page 9, lines 18-19:

- a. Identify all products in addition to MOL with respect to which the Help Desk will provide assistance.
- b. Are the products listed in response to subpart a the same as the products with respect to which the Help Desk provided assistance during the market test of MOL? Describe any differences.

- c. If there are differences as set forth in subpart b, how did you account for those differences in developing the 25% cost driver you used to allocate a portion of Help Desk costs to MOL?
- d. Describe generally any differences in the way the Help Desk will operate during the experimental period on the USPS.com platform compared to the way the Help Desk operated on the Post Office Online platform.

MASA/USPS-T3-2. In your testimony (at 10 lines 1-3), you state that to develop the Help Desk cost driver you “used the number of calls and e-mail inquiries received by the help desk during the market test,” and that “this may not correspond directly to the experimental period under USPS.com.”

- a. Confirm that the number of calls and e-mail inquiries you refer to is equal to the total number of such telephone calls and e-mail inquiries received over the entire life of the market test until its termination in May 1999. If you cannot confirm, explain why not.
- b. How many (i) calls and (ii) e-mail inquiries were received by the Help Desk during the market test?
- c. Explain in what ways the market test numbers “may not correspond” to the experimental period under USPS.com.

MASA/USPS-T3-3. Confirm that in your testimony in MC98-1, you accounted for what you called Technical Help Desk costs, and did not attribute the expenses associated with

fielding other, non-technical, inquiries from customers or prospective customers of MOL that would have been handled by the Post Office Online help Desk.

- a. Are the Help Desk costs quantified at Workpaper C page 8 entirely the result of “Technical Help Desk” costs, that is, they do not include any costs incurred by the Postal Service for customer inquiries about MOL of a non-technical nature?
- b. Confirm that Technical Help Desk inquiries are inquiries of a technical nature about how the software and Internet connection works. If you cannot confirm, explain what is included in and excluded from your definition of Technical Help Desk calls.
- c. Have you accounted for “non-technical” customer inquiries? If so, how?
- d. If you have not accounted for non-technical customer inquiries, confirm that such inquiries will occur, that they will be handled by the USPS.com help desk, and give your best estimate of the number of such inquiries that can be expected.

MASA/USPS-T3-4. In MC98-1, Postal Service witness Stirewalt estimated total Help Desk call hours (LR 1, Attachment 1), based on an assumption that the first call from a customer would last an average of .5 hours, and the subsequent calls would last an average of .1 hours.

Describe how, if at all, you have relied on or changed these assumptions of witness Stirewalt.

- a. How many call hours do you estimate will be required for MOL Technical Help Desk inquiries during the experimental period?
- b. How many call hours do you estimate will be required for USPS.com help desk inquiries during the experimental period?

MASA/USPS-T3-5. Confirm that you would expect Help Desk usage to increase as MOL usage increases.

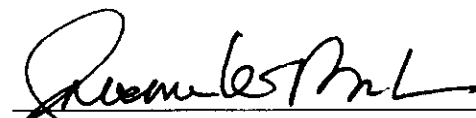
MASA/USPS-T3-6. With respect to your estimates of Help Desk usage associated with MOL:

- a. How many Help Desk (i) calls and (ii) e-mails did you assume would be required for MOL by transaction and by volume (per impression) over the life of the experiment?
- b. How many Help Desk (i) calls and (ii) e-mails did the Postal Service handle for MOL by transaction and by volume (per impression) over the life of the market test?
- c. If you did not make the above calculations in preparing your testimony, make the calculations required to answer subparts a & b.

MASA/USPS-T3-7. Did you consider allocating Help Desk costs as a function of the MOL volume or transactions expected during the experimental period? Explain why you

decided not to use an allocation methodology based on number of Help Desk inquiries as a function of volume and/or transactions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Graeme W. Bush", written over a horizontal line.

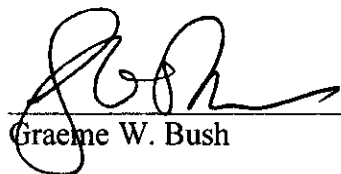
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December 28, 1999

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Mail Advertising Service Association International's Interrogatories to United States Postal Service Witness Lim, was served upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice this 28th day of December, 1999.

  
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Graeme W. Bush