

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

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OFFICE OF THE SECRETARY

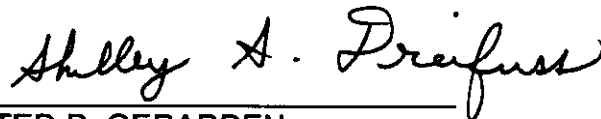
Mailing Online Experiment)

Docket No. MC2000-2

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS CHONG BUM LIM (OCA/USPS-T3-1-33)
(December 29, 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-T-3-1. Please refer to your testimony at page 10. You state "Based on current usage levels in San Mateo" Please explain what this "current usage" consists of and how it relates to MOL since the withdrawal of the previous MOL experiment request on May 5, 1999.

OCA/USPS-T-3-2. Please refer to your testimony at page 10. Please specify the volume estimates that underlie your MOL T3 connection usage. Also state any assumptions made concerning the number of simultaneous users of MOL. Provide the source of volume figures and assumptions made.

OCA/USPS-T-3-3. Do you expect the T3 connection usage to increase during the life of the experiment? If so, how much? If not, explain why.

OCA/USPS-T-3-4. What is the source of the T3 connection fee set forth at line 190 of Workpaper A? Please state specifically your source(s) for the \$648,000 and \$1,296,000 figures. If your sources are written documents, then provide copies of such documents and cite the specific pages relied upon. If your source(s) are individuals, then state the following for each individual who contributed to the development of the connection fee estimates:

- a. company or organization that employs this individual,
- b. organizational unit or department within the company or organization,
- c. position of individual within the company or organization,
- d. all sources and assumptions utilized by the individual to reach the conclusions that were provided to you,

- e. the medium used by individuals to communicate information to you (state specifically whether the communication was oral or in writing).
- f. Also provide any written information transmitted to you by individuals listed above that was used to develop the connection fee estimates.
- g. Provide any notes that you made reflecting any oral communications made by such individuals to you.
- h. If no written materials currently exist, then specifically state, to the best of your recollection, each conversation you had with the individuals listed above.

OCA/USPS-T-3-5. Please refer to USPS-T-3, Workpaper A, lines 1-117.

- a. How did you determine the type of hardware and equipment that would be necessary to implement the MOL experiment? Please state specifically your source(s) for the hardware and equipment items listed. If your sources are written documents, then provide copies of such documents and cite the specific pages relied upon. If your source(s) are individuals, then state the following for each individual who contributed to the development of hardware and equipment estimates:
 - i. company or organization that employs this individual,
 - ii. organizational unit or department within the company or organization,
 - iii. position of individual within the company or organization,
 - iv. all sources and assumptions utilized by the individual to reach the conclusions that were provided to you,
 - v. the medium used by individuals to communicate information to you (state specifically whether the communication was oral or in writing).

- vi. Also provide any written information transmitted to you by individuals listed above that was used to develop the hardware and equipment estimates.
 - vii. Provide any notes that you made reflecting any oral communications made by such individuals to you.
 - viii. If no written materials currently exist, then specifically state, to the best of your recollection, each conversation you had with the individuals listed above.
- b. How did you determine the quantities of hardware and equipment that would be necessary to implement the MOL experiment? Please state specifically your source(s) for the quantities of hardware and equipment items listed. If your sources are written documents, then provide copies of such documents and cite the specific pages relied upon. If your source(s) are individuals, then state the following for each individual who contributed to the development of estimates of hardware and equipment quantities:
- i. company or organization that employs this individual,
 - ii. organizational unit or department within the company or organization,
 - iii. position of individual within the company or organization,
 - iv. all sources and assumptions utilized by the individual to reach the conclusions that were provided to you,
 - v. the medium used by individuals to communicate information to you (state specifically whether the communication was oral or in writing).

- vi. Also provide any written information transmitted to you by individuals listed above that was used to develop estimates of hardware and equipment quantities.
- vii. Provide any notes that you made reflecting any oral communications made by such individuals to you.
- viii. If no written materials currently exist, then specifically state, to the best of your recollection, each conversation you had with the individuals listed above.

OCA/USPS-T-3-6. Does the list of hardware and equipment in lines 1-117 of Workpaper A constitute an estimate of all hardware and equipment expenditures that will be necessary over the course of the entire 3-year experiment? If not, then state the period of time for which these items will be acquired.

OCA/USPS-T-3-7. Explain how the Postal Service's plan "to have its full network of 25 print sites in place near the middle of the second year of the experiment" (Request at 3) has resulted in estimates of specific quantities of hardware and equipment to be listed in Workpaper A. By way of illustration, if the Postal Service were to have planned approximately half the number of print sites—say 12 print sites in total for the duration of the experiment—which hardware and equipment estimates would have changed, and by how much? Please be specific.

OCA/USPS-T-3-8. For purposes of developing the hardware and equipment estimates presented in lines 1-117 of Workpaper A, what assumption was made concerning the number of simultaneous MOL users?

- a. State the number of simultaneous users assumed.
- b. Explain how this assumption affects the type and quantity of hardware and equipment that must be acquired.
- c. For purposes of illustration, how would specific hardware and equipment acquisitions be affected if the number stated in response to part a. of this interrogatory were to double? How would specific hardware and equipment acquisitions be affected if the number stated in response to part a. of this interrogatory were to be halved?

OCA/USPS-T-3-9. Do the anticipated hardware and equipment needs set forth in lines 1-117 of Workpaper A reflect the yearly and total volume estimates for impressions and pieces (i.e., as indicated by the volume of envelopes), that are set forth in Exh. USPS-5A? If not, then what volume assumptions underlie the hardware/equipment estimates? If so, explain the relationship between the volume estimates and the type and quantity of equipment set forth in the workpaper.

- a. By way of illustration, how would the hardware and equipment estimates change if total volume were doubled?
- b. By way of illustration, how would the hardware and equipment estimates change if total volume were halved?
- c. By way of illustration, how would the hardware and equipment estimates change if yearly volumes remained constant, instead of increasing steadily over the 3-year period?

OCA/USPS-T-3-10. Does the Postal Service currently own any of the equipment listed in lines 1-117 of Workpaper A as a result of offering MOL during the operations test or the market test?

- a. If so, how are the expenditures for currently-owned equipment accounted for in Workpaper A?
- b. If expenditures for currently-owned equipment are not included in the Workpaper A cost estimates, then has witness Plunkett accounted for them in his analysis? (This may be redirected to witness Plunkett for a response). Give a specific explanation, including citations, to the place(s) in Postal Service testimony or workpapers where expenditures for already-owned equipment are accounted for.

OCA/USPS-T-3-11. Please refer to USPS-T-3, Workpaper A, lines 119-174.

- a. How did you determine the type of software that would be necessary to implement the MOL experiment? Please state specifically your source(s) for the software listed. If your sources are written documents, then provide copies of such documents and cite the specific pages relied upon. If your source(s) are individuals, then state the following for each individual who contributed to the development of software estimates:
 - i. company or organization that employs this individual,
 - ii. organizational unit or department within the company or organization,
 - iii. position of individual within the company or organization,
 - iv. all sources and assumptions utilized by the individual to reach the conclusions that were provided to you,

- v. the medium used by individuals to communicate information to you (state specifically whether the communication was oral or in writing).
 - vi. Also provide any written information transmitted to you by individuals listed above that was used to develop software estimates.
 - vii. Provide any notes that you made reflecting any oral communications made by such individuals to you.
 - viii. If no written materials currently exist, then specifically state, to the best of your recollection, each conversation you had with the individuals listed above.
- b. How did you determine the quantities of software that would be necessary to implement the MOL experiment? Please state specifically your source(s) for the quantities of software listed. If your sources are written documents, then provide copies of such documents and cite the specific pages relied upon. If your source(s) are individuals, then state the following for each individual who contributed to the development of estimates of software quantities:
- i. company or organization that employs this individual,
 - ii. organizational unit or department within the company or organization,
 - iii. position of individual within the company or organization,
 - iv. all sources and assumptions utilized by the individual to reach the conclusions that were provided to you,
 - v. the medium used by individuals to communicate information to you (state specifically whether the communication was oral or in writing).

- vi. Also provide any written information transmitted to you by individuals listed above that was used to develop estimates of software quantities.
- vii. Provide any notes that you made reflecting any oral communications made by such individuals to you.
- viii. If no written materials currently exist, then specifically state, to the best of your recollection, each conversation you had with the individuals listed above.

OCA/USPS-T-3-12. Does the list of software in lines 119-174 of Workpaper A constitute an estimate of software expenditures that will be necessary over the course of the entire 3-year experiment? If not, then state the period of time for which the software will be acquired.

OCA/USPS-T-3-13. Explain how the Postal Service's plan "to have its full network of 25 print sites in place near the middle of the second year of the experiment" (Request at 3) has resulted in estimates of specific quantities of software to be listed in Workpaper A. By way of illustration, if the Postal Service were to have planned approximately half the number of print sites—say 12 print sites in total for the duration of the experiment—which software estimates would have changed, and by how much? Please be specific.

OCA/USPS-T-3-14. For purposes of developing the software estimates presented in lines 119-174 of Workpaper A, what assumption was made concerning the number of simultaneous MOL users?

- a. State the number of simultaneous users assumed.

- b. Explain how this assumption affects the type and quantity of software that must be acquired.
- c. For purposes of illustration, how would specific software acquisitions be affected if the number stated in response to part a. of this interrogatory were to double? How would specific software acquisitions be affected if the number stated in response to part a. of this interrogatory were to be halved?

OCA/USPS-T-3-15. Do the anticipated software needs set forth in lines 119-174 of Workpaper A reflect the yearly and total volume estimates for impressions and pieces (i.e., as indicated by the volume of envelopes), that are set forth in Exh. USPS-5A? If not, then what volume assumptions underlie the software estimates? If so, explain the relationship between the volume estimates and the type and quantity of software set forth in the workpaper.

- a. By way of illustration, how would the software estimates change if total volume were doubled?
- b. By way of illustration, how would the software estimates change if total volume were halved?
- c. By way of illustration, how would the software estimates change if yearly volumes remained constant, instead of increasing steadily over the 3-year period?

OCA/USPS-T-3-16. For the software listed at lines 121-174, state for each software item whether it is "off-the-shelf" or customized. If the software is customized, then state which company (or individual) designed the software and how the cost was estimated.

OCA/USPS-T-3-17. Please refer to USPS-T-3, Workpaper A, lines 176-188.

- a. How did you determine the type of telecom/networking item that would be necessary to implement the MOL experiment? Please state specifically your source(s) for the telecom/networking items listed. If your sources are written documents, then provide copies of such documents and cite the specific pages relied upon. If your source(s) are individuals, then state the following for each individual who contributed to the development of telecom/networking estimates:
- i. company or organization that employs this individual,
 - ii. organizational unit or department within the company or organization,
 - iii. position of individual within the company or organization,
 - iv. all sources and assumptions utilized by the individual to reach the conclusions that were provided to you,
 - v. the medium used by individuals to communicate information to you (state specifically whether the communication was oral or in writing).
 - vi. Also provide any written information transmitted to you by individuals listed above that was used to develop telecom/networking estimates.
 - vii. Provide any notes that you made reflecting any oral communications made by such individuals to you.
 - viii. If no written materials currently exist, then specifically state, to the best of your recollection, each conversation you had with the individuals listed above.
- b. How did you determine the quantities of telecom/networking items that would be necessary to implement the MOL experiment? Please state specifically your source(s) for the quantities of telecom/networking items listed. If your sources

are written documents, then provide copies of such documents and cite the specific pages relied upon. If your source(s) are individuals, then state the following for each individual who contributed to the development of estimates of quantities of telecom/networking items:

- i. company or organization that employs this individual,
- ii. organizational unit or department within the company or organization,
- iii. position of individual within the company or organization,
- iv. all sources and assumptions utilized by the individual to reach the conclusions that were provided to you,
- v. the medium used by individuals to communicate information to you (state specifically whether the communication was oral or in writing).
- vi. Also provide any written information transmitted to you by individuals listed above that was used to develop estimates of quantities of telecom/networking items.
- vii. Provide any notes that you made reflecting any oral communications made by such individuals to you.
- viii. If no written materials currently exist, then specifically state, to the best of your recollection, each conversation you had with the individuals listed above.

OCA/USPS-T-3-18. Please refer to line 194 of Workpaper A. Please explain in detail the work performed under the description "MOL Cost for Development (to Date)." State specifically your source(s) for the \$3,258,290 cost figure. If your sources are written documents, then provide copies of such documents and cite the specific pages relied

upon. If your source(s) are individuals, then state the following for each individual who contributed to the development of the cost figure:

- a. company or organization that employs this individual,
- b. organizational unit or department within the company or organization,
- c. position of individual within the company or organization,
- d. all sources and assumptions utilized by the individual to reach the conclusions that were provided to you,
- e. the medium used by individuals to communicate information to you (state specifically whether the communication was oral or in writing).
- f. Also provide any written information transmitted to you by individuals listed above that was used to develop the cost figure.
- g. Provide any notes that you made reflecting any oral communications made by such individuals to you.
- h. If no written materials currently exist, then specifically state, to the best of your recollection, each conversation you had with the individuals listed above.

OCA/USPS-T-3-19. Please refer to line 195 of Workpaper A. Please explain in detail the work performed under the description "MOL Application Development." State specifically your source(s) for the \$970,202 cost figure. If your sources are written documents, then provide copies of such documents and cite the specific pages relied upon. If your source(s) are individuals, then state the following for each individual who contributed to the development of the cost figure:

- a. company or organization that employs this individual,
- b. organizational unit or department within the company or organization,

- c. position of individual within the company or organization,
- d. all sources and assumptions utilized by the individual to reach the conclusions that were provided to you,
- e. the medium used by individuals to communicate information to you (state specifically whether the communication was oral or in writing).
- f. Also provide any written information transmitted to you by individuals listed above that was used to develop the cost figure.
- g. Provide any notes that you made reflecting any oral communications made by such individuals to you.
- h. If no written materials currently exist, then specifically state, to the best of your recollection, each conversation you had with the individuals listed above.

OCA/USPS-T-3-20. Please refer to line 196 of Workpaper A. Please explain in detail the work performed under the description "MOL Enhancements." State specifically your source(s) for the \$9,395,581 cost figure. If your sources are written documents, then provide copies of such documents and cite the specific pages relied upon. If your source(s) are individuals, then state the following for each individual who contributed to the development of the cost figure:

- a. company or organization that employs this individual,
- b. organizational unit or department within the company or organization,
- c. position of individual within the company or organization,
- d. all sources and assumptions utilized by the individual to reach the conclusions that were provided to you,

- e. the medium used by individuals to communicate information to you (state specifically whether the communication was oral or in writing).
- f. Also provide any written information transmitted to you by individuals listed above that was used to develop the cost figure.
- g. Provide any notes that you made reflecting any oral communications made by such individuals to you.
- h. If no written materials currently exist, then specifically state, to the best of your recollection, each conversation you had with the individuals listed above.

OCA/USPS-T-3-21. Please refer to line 197 of Workpaper A. Please explain in detail the work performed under the description "MOL Integration with USPS.com." State specifically your source(s) for the \$250,000 cost figure. If your sources are written documents, then provide copies of such documents and cite the specific pages relied upon. If your source(s) are individuals, then state the following for each individual who contributed to the development of the cost figure:

- a. company or organization that employs this individual,
- b. organizational unit or department within the company or organization,
- c. position of individual within the company or organization,
- d. all sources and assumptions utilized by the individual to reach the conclusions that were provided to you,
- e. the medium used by individuals to communicate information to you (state specifically whether the communication was oral or in writing).
- f. Also provide any written information transmitted to you by individuals listed above that was used to develop the cost figure.

- g. Provide any notes that you made reflecting any oral communications made by such individuals to you.
- h. If no written materials currently exist, then specifically state, to the best of your recollection, each conversation you had with the individuals listed above.

OCA/USPS-T-3-22. Please refer to the data report for A/P1, FY 2000, Table 3. MOL Development and Coding costs for V2 and V3 are set forth in this table in the amount of \$2,920,485.90. Please explain exactly where and how these costs have been taken into account in your workpapers.

OCA/USPS-T-3-23. Please refer to the data report for A/P2, FY 2000, Table 3. MOL Development and Coding costs for V2 and V3 are set forth in this table in the amount of \$479,023.84. Please explain exactly where and how these costs have been taken into account in your workpapers.

OCA/USPS-T-3-24. Please refer to the data report for A/P13, FY 99, Table 3. MOL Development and Coding costs for V2 and V3 are set forth in this table in the amount of \$607,808.95. Please explain exactly where and how these costs have been taken into account in your workpapers.

OCA/USPS-T-3-25. Please refer to the data report for A/P10, FY 99, Table 3. MOL Development and Coding costs for V2 and V3 are set forth in this table in the amount of \$242,343.42. Please explain exactly where and how these costs have been taken into account in your workpapers.

OCA/USPS-T-3-26. Please refer to the data report for A/P11, FY 99, Table 3. MOL Development and Coding costs for V2 and V3 are set forth in this table in the amount of \$270,868. Please explain exactly where and how these costs have been taken into account in your workpapers.

OCA/USPS-T-3-27. Please refer to the data report for A/P12, FY 99, Table 3. MOL Development and Coding costs for V2 and V3 are set forth in this table in the amount of \$355,892.63. Please explain exactly where and how these costs have been taken into account in your workpapers.

OCA/USPS-T-3-28. Please refer to the data report for A/P8, FY 99, Table 3. MOL-Specific Development and Coding costs for V2 and V3 are set forth in this table in the amount of \$490,176.34. Please explain exactly where and how these costs have been taken into account in your workpapers.

OCA/USPS-T-3-29. Please refer to the data report for A/P8, FY 99, Table 3. Shared Development and Coding costs for V2 and V3 are set forth in this table in the amount of \$414,228.80. Please explain exactly where and how these costs have been taken into account in your workpapers.

OCA/USPS-T-3-30. Please refer to the data report for A/P9, FY 99, Table 3. MOL-Specific Development and Coding costs for V3 are set forth in this table in the amount of \$241,680.80. Please explain exactly where and how these costs have been taken into account in your workpapers.

OCA/USPS-T-3-31. Please refer to the data report for A/P9, FY 99, Table 3. Shared Development and Coding costs for V3 are set forth in this table in the amount of \$30,874.40. Please explain exactly where and how these costs have been taken into account in your workpapers.

OCA/USPS-T-3-32. Please refer to the data report for A/P7, FY 99, Table 3. MOL-Specific Development and Coding costs for V2 and V3 and for Certification and Accreditation and are set forth in this table in the amount of \$609,989.83. Please explain exactly where and how these costs have been taken into account in your workpapers.

OCA/USPS-T-3-33. Please refer to the data report for A/P7, FY 99, Table 3. Shared Development and Coding costs for V3 are set forth in this table in the amount of \$921,860.22. Please explain exactly where and how these costs have been taken into account in your workpapers

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.


Shelley S. Dreifuss

Washington, D.C. 20268-0001
December 29, 1999