

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

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OFFICE OF THE SECRETARY

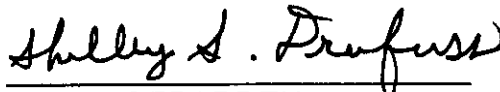
Mailing Online Experiment)

Docket No. MC2000-2

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS LEE GARVEY (OCA/USPS-T1-19-22)
(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,



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-T-1-19. In Docket No. MC98-1, witness Rothschild responded to many interrogatories about her survey in a similar vein, e.g.:

OCA/USPS-T-4-12. When conducted, this research was not designed as support for a Commission filing. A specific level of reliability was neither requested nor recommended, and no precise level of statistical reliability was calculated.

OCA/USPS-T-4-13. a. When conducted, this research was not designed as support for a Commission filing, but as business planning research. Our goal was to determine if there was "enough" volume to warrant further development, not what the total volume of NetPost would be. . . b. Again, let me reiterate that for business planning purposes, the objective was to determine if there was enough volume among the most likely users to warrant further evaluation of NetPost, not to estimate total volume. (Emphasis supplied)

OCA/USPS-T-4-8. Did the sample design for the quantitative phase of the NetPost study produce a statistically significant sample?

Response: The initial (and primary) purpose for this research was to support business planning activities, not to be submitted as testimony before the Postal Rate Commission. Our goal, as stated in page w of the library reference, was to provide an indication of whether there was sufficient interest to justify further evaluation of NetPost. To that end, a probability sample was drawn, interviews conducted and standard errors produced to provide an estimate of the range of NetPost pieces that could be expected based upon the survey results.

Do these statements still reflect the intent and belief of the Postal Service with respect to Ms. Rothschild's survey and its resulting volume estimates? If not, please provide an update.

OCA/USPS-T-1-20. Given the original purpose of the study as detailed in question

OCA/USPS-T-1-12 above, the fact that her survey asked about a Next Day service

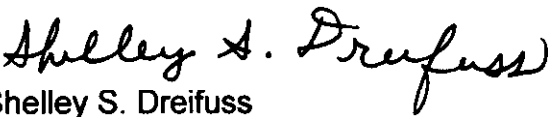
when, in fact, MOL uses regular First-Class Mail service, and the experience gathered from the market test with respect to volumes of MOL, do you believe that Ms. Rothschild's volume estimates may be significantly overstated? If so, do you have any estimate of how overstated they may be? If not, please explain why you do not believe that the estimates are overstated.

OCA/USPS-T-1-21. Please provide copies of any advertising materials that were developed and/or utilized during the MOL Market Test that are not already on file in Docket No. MC98-1.

OCA/USPS-T-1-22. Advertising expenditures are reported in Table(s) 1 of several of the A/P reports filed pursuant to the Market Test Data Collection and Reporting System. Please explain in detail the purpose of these expenditures.

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