

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

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS MICHAEL K. PLUNKETT (OCA/USPS-T5-6-8)
(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 an interrogatory and request 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

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OCA/USPS-T-5-6. Please refer to your testimony at pages 10 and 11, line 23, and lines 1-2, respectively, where it states "Moreover, at projected volumes Mailing Online pieces will achieve depth of sort that is, on average, much greater than required to qualify for automation basic rates."

- a. Please explain in detail how the Postal Service intends to verify that volume of Mailing Online pieces during the experiment will achieve a depth of sort that is, on average, much greater than required to qualify for automation basic rates.
- b. Please confirm that, as part of the "Experimental Data Collection Plan," the Postal Service will compute and report the actual average depth of sort achieved for Mailing Online pieces during the experiment. If you do not confirm, please explain.

OCA/USPS-T-5-7. Have you set the size and amount of MOL fees to recover any of the advertising costs for MOL (even if shared with other services) that have been expended to date, including the operations test and the market test?

- a. If so, explain how these costs are to be recovered through MOL fees. Include citations to Postal Service testimony, exhibits, and workpapers.
- b. If not, why not?

OCA/USPS-T-5-8. The Mailing Online Accounting Period data reports filed with the Commission throughout (and following) the market test have reported five types of costs. Please provide a crosswalk to your testimony and exhibits, *for every A/P report* filed with the Commission, for each of the costs reported in:

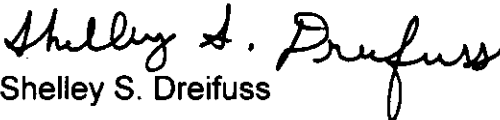
- a. Table 1, Advertising and Marketing costs

- b. Table 2, Help Desk costs
- c. Table 3, Hardware and Software costs
- d. Table 4, Communications costs
- e. Table 5, Print Site costs

Include an explanation of how each of these costs have been included in either the attributable costs of MOL or have been recovered through the cost coverage you propose for MOL.

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