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

Mailing Online Experiment   )   Docket No. MC2000-2

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: LEE GARVEY (OCA/USPS-T1-23-25)
(January 5, 2000)

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-T1-23. Please refer to your response to OCA/USPS-T1-7. As stated in the hypothetical posed in OCA/USPS-T1-7, the competitive hybrid mail service contracts with each of the 25 Postal Service print site operators to install another server identical to the Postal Service's server at each print site and the operator charges the same printing fees. The hypothetical also asks you to "assume that on the same day both the Postal Service and the competitive hybrid mail service transmit to the print site operator identical small-volume mailings (i.e., having the same volume below the threshold minimum, job-type characteristics, and page count) that cannot be batched."

Assume further that the competitive hybrid mail service takes advantage of the same "methods for driving out a variety of mail processing costs" as Mailing Online. These same methods include the fact that the competitive hybrid mail service "commingles respective customers' mail, checks and corrects address elements, generates automation compatible pieces, presorts to the greatest extent possible when truly large volumes are projected, . . . and (in conformity with the hypothetical) provides for a close cousin to destination entry" (by virtue of the competitive hybrid mail service's using all the same and only the same print sites as the Postal Service).

a.   Please confirm the only difference between the two mailings would be the postage paid upon entry. That is, that all of the Postal Service's Mailing Online mailpieces would be charged the Automation Basic rate, while the mailpieces of the competitive hybrid mail service provider would be charged rates for which the mailpieces qualify (i.e., the single piece rate). If you do not confirm, please explain.

b.   Please confirm that Mailing Online, as proposed by the Postal Service in this

proceeding, is not based on or justified by any unit cost savings related to the

automation compatibility, presortation and destination entry (i.e. "the Mailing

Online server commingles respective customers' mail, checks and corrects

address elements, generates automation compatible pieces, presorts to the

greatest extent possible when truly large volumes are projected, . . . and . . .

destination entry") of Mailing Online mailpieces. If you do not confirm, please

explain and provide the unit cost savings for Mailing Online mailpieces related to

automation compatibility, presortation and destination entry.

c.   Please confirm that when First-Class and Standard (A) Mailing Online

automation compatible mailpieces are presented at the specified postal facilities

where Mailing Online mailpieces will be entered, the requirements for acceptance

will be the same as for other First-Class and Standard (A) automation compatible

mailpieces presented for entry by all other mailers. If you do not confirm, please

explain.

OCA/USPS-T1-24. Please refer to your response to OCA/USPS-T1-10, and your

response to MASA/USPS-T1-4. Also, please refer to the attached table entitled "Table

Depicting Batching Capability of the Version 3 System Software During the Mailing

Online Experiment." (Note: The electronic version of this table can be found in the

Excel file "ocaatt24.xls.") Based upon your response to OCA/USPS-T1-10 and

MASA/USPS-T1-4, please confirm that the table correctly depicts the batching

capability of the Version 3 system software on the first day of the experiment. If you do

not confirm, please correct the table. If there is a "No" in a cell, please provide the date during the experiment on which that batching capability will exist.

OCA/USPS-T1-25. Please refer to your response to OCA/USPS-T1-13(1).

a.   Please confirm that on the first day of the experiment, the Mailing Online system will have the capability to store permanently electronic copies of the mailing statements, Forms 3600 and 3602, and the USPS Qualification Reports.

b.   Please confirm that on the first day of the experiment, the Mailing Online system will, in fact, collect volume data in electronic form from the mailing statements, Forms 3600 and 3602, and the USPS Qualification Reports, and "store permanently" such data so as to permit the 1) association of the USPS Qualification Reports and the batch numbers of Mailing Online documents and 2) preparation of "look-up" tables for each job-type and page-count, by presort level.

c.   If you do not confirm parts a. or b. of this interrogatory, please explain.

TABLE DEPICTING BATCHING CAPABILITY OF VERSION 3 SYSTEM SOFTWARE DURING THE MAILING ONLINE EXPERIMENT

(Note: The letters and numbers in parenthesis in each cell refer to the parts and subparts of OCA/USPS-T1-10.)

	Job-Type	Page-Count	FIRST-CLASS MAIL		STANDARD (A) MAIL	
			Merge Mail	Non-Merge Mail	Merge Mail	Non-Merge Mail
LETTER-SHAPED	Same	Same	10(a)(1) Yes	10(a)(2) Yes	10(a)(1) Yes	10(a)(2) Yes
	Same	Different	10(b)(1) No	10(b)(2) No	10(b)(1) No	10(b)(2) No
	Different	Same	10(c)(1) No	10(c)(2) No	10(c)(1) No	10(c)(2) No
	Different	Different	No	No	No	No
	Same	Same	Yes		Yes	
	Same	Different	No		No	
	Different	Same	No		No	
	Different	Different	No		No	
FLAT-SHAPED	Same	Same	10(d)(1) Yes	10(d)(2) Yes	10(d)(1) Yes	10(d)(2) Yes
	Same	Different	10(e)(1) Yes	10(e)(2) Yes	10(e)(1) Yes	10(e)(2) Yes
	Different	Same	10(f)(1) No	10(f)(2) No	10(f)(1) No	10(f)(2) No
	Different	Different	No	No	No	No
	Same	Same	Yes		Yes	
	Same	Different	Yes		Yes	
	Different	Same	No		No	
	Different	Different	No		No	

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

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Washington, D.C. 20268-0001
January 5, 2000