

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

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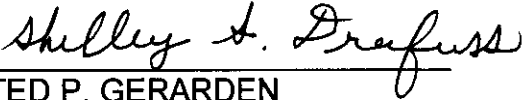
Mailing Online Experiment)

Docket No. MC2000-2

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: LEE GARVEY (OCA/USPS-T1-26-27)
(January 7, 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-T1-26. Please refer to your response to OCA/USPS-T1-17, where you state that “The Postal Service has neither planned nor calculated time estimates needed to implement any alternative production systems . . .” However, at page 4, lines 19-22, of your rebuttal testimony (USPS-RT-1) in Docket No. MC98-1, you state

Incorporation of a system using thousands of lookup tables into the Mailing Online system is simply not feasible given our current timetable, and would likely result in a delay of the service until some time later than March, 2000.

At the time of this statement, March 2000 was approximately 1 year after the filing of your rebuttal testimony on March 22, 1999.

Is the timetable in this statement still correct? That is, implementing a production system of the pricing formula (Equation 1) found in section IV.B. of OCA witness Callow’s testimony (OCA-T-100) in Docket No. MC98-1 would delay implementation of the Mailing Online service for approximately one year. Please explain your answer.

OCA/USPS-T1-27. Please refer to your response to OCA/USPS-T1-17, where it states “These difficulties alone justify my opinion that there is virtually no realistic likelihood that Postal Service management would even consider asking the Governors to implement such a system [as proposed in OCA-T100 in Docket No. MC98-1] during an experiment intended simply to determine whether Mailing Online constitutes a viable product.”

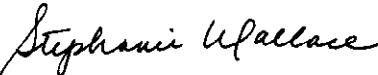
Assume, instead, the Commission recommends a Mailing Online service for the experiment with the following attributes:

- Offering postage charges consisting of Automation Basic for First-Class, or Automation Basic for Standard (A) Mail for all Mailing Online mailpieces, as proposed by the Postal Service, during the first 18 months of the experiment
- The collection of volume data on the actual level of presortation achieved for each job type and page count during the first 18 months of the experiment
- At the end of the first 18 months of the experiment, the calculation of an experience-based weighted average rate for each job type and page count based upon the actual presorting experience of the Postal Service during the first 18 months of the experiment
- Offering postage charges reflecting the experience-based weighted average rate for each Mailing Online mailing of a given job type during the second 18 months of the experiment
- Modification of the Mailing Online system software to incorporate the presort-level volume data by job type and page in “look-up” tables by class for use in calculating postage charges during the second 18 months of the experiment

Please discuss the likelihood that Postal Service management would consider asking the Governors to implement a system for the experiment with the attributes assumed above.

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

Washington, D.C. 20268-0001
January 7, 2000