

ORIGINAL

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

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POSTAL RATE
OFFICE OF THE SECRETARY

Mailing Online Service, 1998)

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS: MICHAEL K. PLUNKETT
(OCA/USPS-T5-14)
(July 23, 1998)

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-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Emmett Rand Costich

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Acting Assistant Director



OCA/USPS-T5-14. Please refer to your testimony at page 13, lines 9-11. You state that "the Postal Service has been conducting an operations test during which customers have received free printing services"


- a. Have these "free printing services" ever been performed on site at a postal facility. If so, please identify that facility and describe its physical relationship to the facility referred to in interrogatory OCA/USPS-T5-3(b).
- b. Please provide the total Postal Service expenditures to date on "free printing services."
- c. Have these "free printing services" ever been performed off site at a nonpostal facility. If so, please identify that facility and describe its physical relationship to the facility referred to in interrogatory OCA/USPS-T5-3(b).
- d. Has the "operations test" ever involved the transportation of Mailing Online pieces between a printing site and the facility referred to in interrogatory OCA/USPS-T5-3(b)? If so, please identify the form(s) of transportation utilized (contract highway intra SCF, VSD, private printer vehicle, etc.).
- e. Please provide the total Postal Service expenditures to date on the transportation services referred to in part (d) of this interrogatory.
- f. Since the commencement of the operational test period, on how many days have Mailing Online pieces been transported to the facility referred to in part (b) of interrogatory OCA/USPS-T5-3? On how many days have there been no transportation runs?

- g. Please provide a frequency distribution showing the number of days on which 0, 1, 2, etc., transportation runs of Mailing Online pieces have been made to the facility referred to in part (b) of interrogatory OCA/USPS-T5-3 since the commencement of the operational test period.
- h. Please provide a tabulation showing the volume of Mailing Online pieces broken down by number of transportation runs per day. In other words, the tabulation should show the total volume of Mailing Online received at the facility referred to in part (b) of interrogatory OCA/USPS-T5-3 on days when 1, 2, 3, etc., transportation runs were made.
- i. During the "operations test," have Mailing Online pieces been entered through a Bulk Mail Acceptance Unit? If not, please describe precisely how Mailing Online pieces have entered the mailstream at the facility referred to in interrogatory OCA/USPS-T5-3(b). Please describe all documents created or exchanged during the entry process and provide examples of such documents.
- j. Please provide copies of all documents ^{relating} ~~referring~~ to the "operations test." (See instructions for definitions of "all documents" and ^{relating} ~~referring to~~." The OCA is particularly interested in documents describing or evaluating the "operations test" or any portion thereof.)
- k. Was any evaluation of the "operations test" made prior to the decision to proceed to a market test? If not, why not? If so, please provide a copy of the evaluation.
- l. Has the feasibility of Mailing Online been reevaluated since the commencement of the "operations test"? If not, why not? If so, please provide copies of all

documents relating to such reevaluation. (See instructions for definitions of "all documents" and "^{relating}~~referring to.~~")

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.


Emmett Rand Costich
Attorney

Washington, D.C. 20268-0001
July 23, 1998