ORIGINAL

BEFORE THE POSTAL RATE COMMISSION WASHINGTON DC 20268-0001

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MAILING ONLINE SERVICE

DOCKET NO. MC98-1 OFFICE AT THE GROUP OF

INTERROGATORIES OF DAVID B. POPKIN TO WITNESS LEE GARVEY OF THE UNITED STATES POSTAL SERVICE

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. Particularly since the Postal Service is encouraging cooperation from the intervenors, I request that similar cooperation in liberally interpreting the requests made by my interrogatories and provide the desired information. To reduce the volume of paper, I have combined related requests into a single numbered interrogatory, however, I am requesting that a specific response be made to each separate question asked. To the extent that a reference is made in the responses to a Library Reference, I would appreciate receiving a copy of the reference since I am located at a distance from Washington, DC. All responses should be complete without reference to any previous Postal Rate Commission dockets. If necessary, these interrogatories should be redirected to the appropriate witness or responded to by the Postal Service.

July 27, 1998

Respectfully submitted.

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-T1-1 With respect to the commercial print sites that will be employed in this service; [a] Will the originator be able to choose the specific printer or printers to utilize for their mailing? [b] Can this choice be made on the basis of cost and/or location with respect to the destination of the mail? [c] Will all of the printers be able to provide the same service? [d] Explain any negative answers.

DBP/USPS-T1-2 On page 3 - lines 2 and 3 - you indicate that mailing lists can be submitted in four standard PC formats. [a] What are these formats? [b] Is dBase an acceptable format? [c] If not, will it be available?

DBP/USPS-T1-3 Regarding the expanded test scheduled for September 1, 1998; [a] Elaborate on the specific areas covered by the New York, Boston, and Philadelphia metropolitan areas. [b] Will I, as well as any other individual mailers in Northern New Jersey, be able to utilize the service? [c] What criteria will be required for participants in this service? [d] Confirm that access to the Postal Service's website may be made from anywhere in the world. [e] Confirm that the Postal Service will not be able to determine the physical location of a mailer logging on the website. [f] If I am an "authorized" mailer in New Jersey, will I be able to access the system from by brother's computer in Oregon? [g] Why is there a restriction as to who can participate in the service? [h] If there are restrictions, explain why you feel that it would not be discriminatory. [i] Fully explain any negative responses.

DBP/USPS-T1-4 On page 9 - lines 8-9 - you indicate time-specific mail entry will be available and a major advantage of the program. [a] Will a customer be able to access the Postal Service URL 24 hours a day, 7 days a week? [b] If not, list the available times. [c] Will a customer be able to specify a date in the future for the mailing to take place? [d] How far in advance will be permitted?

DBP/USPS-T1-5 [a] How fast will it be possible to have a mailing be processed from the time of placing it on the Postal Service's website until the time that it is deposited into the postal mail-processing facility? [b] Will it be possible to submit a mailing and have it be processed the same date? [c] If so, what do you contemplate would be the cut-off time? [d] If not, do you expect that it will be possible to do so in the future?

DBP/USPS-T1-6 [a] Will the envelope be able to show the mailer's return address? [b] If not, will any return address be utilized? [c] If a "centralized" return address is utilized, will any undeliverable mail be promptly returned to the mailer? [d] If not, explain. [e] What method will be utilized to indicate that the postage has been paid? [f] If it is a permit imprint, provide the wording that is presently utilized as well as any proposed change.

DBP/USPS-T1-7 [a] Will any of the various address correction services be available for use? [b] If not, explain why not.

DBP/USPS-T1-8 [a] Will a mailer be able to utilize card stock of the proper dimensions and characteristics so as to qualify for the post card rate? [b] If not, explain why not. [c] If not, was this option evaluated prior to filing the rate case and what were the reasons for not adopting it?

DBP/USPS-T1-9 [a] Confirm that the mailer will not have to pay any permit imprint fee or presort fee and that the only postal charge will be for the postage on the letter itself. [b] Confirm that the once the expanded tests starts on September 1, 1998, all mailers, both the present customers as well as the new customers, will pay the discounted postage rates plus the paper/printing/envelope/inserting costs. [c] Confirm that this will be a change for the existing customers who are only paying the regular postage rate and for none of the processing/printing costs. [d] What is the present discounted First-Class postage rate for the first ounce and what will the rate be after January 10, 1999? [e] Fully explain any negative responses.

DBP/USPS-T1-10 Regarding the privacy of the contents of First-Class Mail and the names and addresses of the mail recipients, [a] to what extent will the contents of the mailing be available to or capable of access by employees of the Postal Service? [b] Same as [a], except by employees of outside vendors? [c] Please provide copies of the appropriate sections of the contract which indicate the requirement to ensure

proper privacy. [d] Same as [a] through [c], except with respect to the names and addresses of the recipients.

DBP/USPS-T1-11 Witness Campanelli indicated that the Postal Service will clean his address lists. [a] What items are checked to delete or change an address which is supplied? [b] What charges, if any, exist for the provision of this service? [c] Is this service optional? [d] Is the deletion of addresses made before or after the count used to determine the printing and postage charges for a given mailing? [e] If after, can credit be obtained for the non-incurred charges? [f] If not, why not? Note: If there is any difference in the responses with respect to the different phases of operation, please specify and elaborate.

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.

David B. Popkin

July 27, 1998