

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Mailing Online Service)

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: FRANK E. CAMPANELLI
(OCA/USPS-T8-3-11)
(July 31, 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.

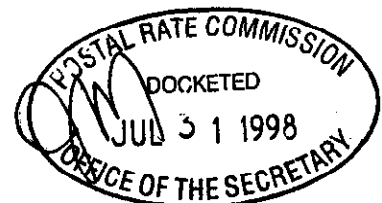
Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Shelley S. Dreifuss

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Attorney



OCA/USPS-T8-3. Please refer to page 3 of your testimony. You state that you can now get your entire mailing completed in about two hours. Please describe the steps you take during that two-hour period to prepare and complete your transaction with the Postal Service.

OCA/USPS-T8-4. You state at page 3 of your testimony that Mailing Online has made it easy to clean your address lists.

- a. Does the Postal Service require you to "clean" your mailing list?
- b. How were you able to determine that some addresses were bad? Please explain.
- c. How has Mailing Online made it easy for you to clean your lists?

OCA/USPS-T8-5. You state at lines 17-18 of page 3 that the ability to clean your lists is coming at a good time. Please explain specifically what this "ability" consists of?

- a. Do you mean that *you* now have the ability to clean the mailing lists or that the Postal Service cleans them for you? Please explain.
- b. If you are the one with the ability, describe in detail how you clean your lists.
- c. If the Postal Service cleans your lists, does it charge a fee for that service?
- d. If a fee is charged, what is the fee?
- e. What does the Postal Service do to clean your lists, i.e., how have your lists been improved after the service has been provided?
- f. Can you obtain the "cleaning" service without participating in Mailing Online?

OCA/USPS-T8-6. Please explain how you transmit your electronic files to the Postal Service?

- a. Do you transmit the direct mail document and mailing list to the Postal Service by means of e-mail?
- b. If so, do you *attach* the electronic files for the direct mailing and the mailing list to an e-mail message? Do you *paste* the electronic direct mailing information and electronic mailing list information into an e-mail message? Please explain.
- c. Have you found that there is any incompatibility in the software you use to generate the direct mail and mailing list and the software used by the Postal Service to receive and produce your mail? Please explain.
- d. Do you upload the electronic files for the direct mail piece and the mailing lists to a Postal Service site on the internet? Please explain.

OCA/USPS-T8-7. How did you learn to use Mailing Online?

- a. Did a Postal Service representative come to your place of business to work with you?
- b. Did you have consultations over the telephone?
- c. Were you given written materials explaining how to use the service? If so, provide copies of any written explanatory materials.
- d. How long did it take you to become proficient in using Mailing Online?
- e. Please give a detailed explanation in responding to the 5 questions comprising this interrogatory.

OCA/USPS-T8-8. You state at page 3 that, prior to using Mailing Online, preparing your direct mailings required approximately 1-1½ days of your time. Did you ever consider having an outside entity prepare the mailing so as to avoid the drain on your time? If you did, why did you rule out that alternative?

OCA/USPS-T8-9. On page 2 of your testimony you state that you have been using Mailing Online since June 3, 1998. However, on page 4, you state that you have been participating in the test for 4 months. Since your testimony was filed on July 15, 1998, this would not appear possible. Please reconcile these two statements.

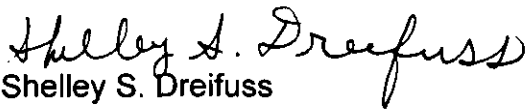
OCA/USPS-T8-10. On page 4 you refer to the "tools provided by Mailing Online." Please describe the "tools" you are referring to.

OCA/USPS-T8-11. On page 3, you state that the "people involved with Mailing Online . . . follow up dutifully" whenever you have a question about the service.

- a. Please state the names and positions of the "people" with whom you have had contact concerning Mailing Online.
- b. What methods are used by postal personnel to follow up on your questions, e.g., telephone, e-mail, mail, in-person visits, etc.? Please explain in detail.

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
Attorney

Washington, D.C. 20268-0001
July 31, 1998