

ORIGINAL

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: BETH B. ROTHSCHILD  
(OCA/USPS-T4-1-11)  
(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  
Acting Director  
Office of the Consumer Advocate



Kenneth E. Richardson  
Attorney



OCA/USPS-T4-1. Please refer to page 4 of your testimony where you discuss the focus groups held during December, 1995 and January, 1996.

- a. Were transcripts made of the focus group tapes? If so, please provide a transcript from one of the twelve focus groups. If not, please explain in detail how the data was analyzed?
- b. Please explain how the focus group data was coded and provide the coded data.

OCA/USPS-T4-2. Please refer to page 4 of your testimony where you list four characteristics for which mailing online was deemed most appropriate and five applications determined to best meet the criteria.

- a. Please provide a crosswalk between the four characteristics and the specific topics listed in Attachment B, Qualitative Discussion Guide.
- b. Please provide a crosswalk between the five applications and the specific topics listed in Attachment B, Qualitative Discussion Guide.

OCA/USPS-T4-3. Were the prices you assumed in the NetPost survey focus groups using 25% and 50% contribution margins for the piece printing and production costs the same prices which are detailed in the testimony of witnesses Seckar and Plunkett in this case? If not, please provide a table of all the prices you assumed in the focus group conversations.

OCA/USPS-T4-4. Did either the quantitative phase or the qualitative phase of the NetPost research involve a discussion or consideration of printing on card stock (folded

or unfolded) for such documents as invitations or greeting cards? If so, what was the level of customer interest and your conclusions regarding this potential application of Mailing Online?

OCA/USPS-T4-5. Please refer to the NetPost research report, Library Reference-LR-2 at page 3 where it states, "The focus groups were configured to represent the full range of potential end-users and intermediaries...." If the NetPost study did not consider customers who might send invitations or greeting cards on card stock, how did you reach this conclusion?

OCA/USPS-T4-6. Please define "quick delivery" as used in the Library Reference LR-2 at the top of page 4.

OCA/USPS-T4-7. Please refer to the statement in LR-2 at page 4 concerning the universe of establishments and producers that "generate at least some NetPost-appropriate pieces...." Was there a minimum number of pieces that needed to be produced in order to qualify for "some" in the universe you defined? If so, what was the minimum?

OCA/USPS-T4-8. Did the sample design for the quantitative phase of the NetPost study produce a statistically significant sample?

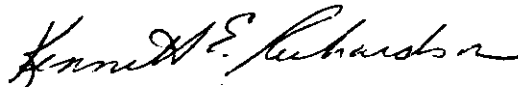
OCA/USPS-T4-9. Please refer to LR-2 at page 5 and explain the basis for selecting the employee size strata as you did with groups of 1-9 & unknown, 10-99 and 100+.

OCA/USPS-T4-10. Please provide the underlying quantitative analysis supporting the conclusions in the paragraph in LR-2 at page 6 relating to the decision to break down the employee size and industry grouping that (1) an industry related to the types and time sensitivity of documents produced, and (2) the organization's size related to comfort with technology and resources to assist in document production and distribution.

OCA/USPS-T4-11. Please explain what is meant by the term "readable base" at the top of page 7 of LR-2.

#### 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.



Kenneth E. Richardson  
Attorney

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