

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

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Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: DANIEL STIREWALT  
(OCA/USPS-T3-7-10)  
(August 3, 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.

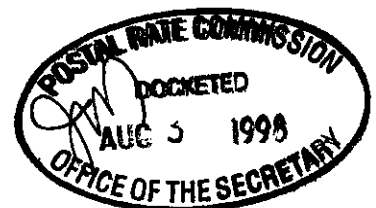
Respectfully submitted,

*Gail Willette*

Gail Willette  
Acting Director  
Office of the Consumer Advocate

*Emmett Rand Costich*

Emmett Rand Costich  
Acting Assistant Director



OCA/USPS-T3-7. Please refer to USPS-LR-1/MC98-1, page 6. You show "Average customer sessions per user per year" of 12. You state, "One per month is assumed based on expected mail content: invoices, announcements, statements, forms . . . ."

- a. Please confirm that "Advertising Mail" and "Newsletters" are also expected applications of Mailing Online. (See USPS-LR-2/MC98-1, page 13.) If you do not confirm please explain.
- b. Please confirm that the "Advertising Mail" and "Newsletters" applications contribute substantially to volume estimates of Mailing Online. (See USPS-LR-2/MC98-1, page 26.) If you do not confirm please explain.
- c. Please confirm that "Advertising Mail" and "Newsletters" are likely to be mailed more frequently than monthly. (See USPS-LR-2/MC98-1, page 13.) If you do not confirm please explain.
- d. Please confirm that most Mailing Online volume in 1999 and 2000 is expected to be Standard Mail. (See USPS-LR-2/MC98-1, page 34.) If you do not confirm, please explain.
- e. Did you request an estimate of the average frequency of use of Mailing Online from witness Rothschild or anyone else? If so, what was the response? If not, why not?
- f. Please confirm that the market research data collected by witness Rothschild can generate an estimate of the average frequency of use of Mailing Online by respondents. If you do not confirm, please explain. If you confirm, please provide that estimate.

- g. Please confirm that your estimate of "Incoming bytes Per Second During Peak Hours" is directly proportional to the assumed "Average customer sessions per user per year"—that is, doubling the latter would double the former. If you do not confirm, please state the mathematical relationship between "Incoming bytes Per Second During Peak Hours" and "Average customer sessions per user per year"

OCA/USPS-T3-8. Please refer to USPS-LR-1/MC98-1, page 6. You show "Percentage usage during daily peak period" of 0.75. You state, "A Peak Period of Usage is required to plan for maximum capacity. % of users expected during such a period is unknown, 75% usage is therefore assumed."

- a. If the 75-percent figure was chosen on some basis other than randomness, please state that basis.
- b. Is the assumption of 75 percent usage during the peak period mathematically equivalent to assuming that 75 percent of each customer's transmissions occurs during the peak period? If not, please explain further the purpose of this assumption.
- c. Please confirm that there is some positive probability that more than 75 percent of customer transmissions may occur in the peak period. For example, all customers might try to send their monthly transmissions during a peak period near the end of the month. If you do not confirm, please explain.
- d. Please confirm that your estimate of "Incoming bytes Per Second During Peak Hours" is directly proportional to the assumed "Percentage usage during daily
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peak period”—that is, increasing the latter by ten percent would increase the former by ten percent. If you do not confirm, please state the mathematical relationship between “Incoming bytes Per Second During Peak Hours” and “Percentage usage during daily peak period.”

OCA/USPS-T3-9. Please refer to USPS-LR-1/MC98-1, page 6. You show “Avg. No. Concurrent Sessions During Peak Hours” of 21.57 for 1999. The formula for calculating this number is given as “Customer sessions during peak period/peak period/avg. session duration.”

- a. Please confirm that this calculation assumes that customer sessions are all of exactly one-half hour duration. If you do not confirm, please explain.
- b. Please confirm that this calculation assumes that customer sessions are uniformly distributed over the peak period. If you do not confirm, please explain.
- c. Please confirm that this calculation assumes that exactly 21.57 customer sessions commence exactly at the beginning of the peak period, continue for exactly one-half hour, and are immediately replaced by another 21.57 customer sessions lasting exactly one-half hour, etc. until 172.53 customer sessions have been completed in four hours. If you do not confirm, please explain.
- d. Please confirm that there is a positive probability that more than 21.57 customers will attempt to transmit documents to the Mailing Online processing center simultaneously at some time during 1999. If you do not confirm, please explain.

- e. Please confirm that it is, in fact, virtually certain that more than 21.57 customers will attempt to transmit documents to the Mailing Online processing center simultaneously at some time during 1999. If you do not confirm, please explain.
- f. Please confirm that if 21.57 is, in fact, the average or expected number of customer sessions during the peak period, then this number will be exceeded on approximately one-half the business days in 1999. That is, to the extent that this average is a measure of central tendency, then one-half of all occurrences will be less than 21.57 and one-half will be greater. If you do not confirm, please explain.
- g. Is the "Avg. No. Concurrent Sessions During Peak Hours" of 21.57 for 1999 used at any other point in USPS-LR-1/MC98-1? If so, please identify all such other uses.
- h. Is the "Avg. No. Concurrent Sessions During Peak Hours" of 21.57 for 1999 used by any other witness in MC98-1? If so, please identify all such other uses.
- i. During the operations test period, how many access ports were available at the MOL processing center to receive transmissions from MOL customers? Did this number vary during the operations test period? If so, for what reasons? (E.g., did some or all of the ports fail temporarily?)
- j. Please confirm that "Avg. No. Concurrent Sessions During Peak Hours" is directly proportional to "Customer sessions during peak period" —that is, doubling the latter would double the former. If you do not confirm, please state

the mathematical relationship between “Avg. No. Concurrent Sessions During Peak Hours” and “Customer sessions during peak period.”

- k. Please confirm that “Avg. No. Concurrent Sessions During Peak Hours” is directly proportional to “Average session duration” —that is, doubling the latter would double the former. If you do not confirm, please state the mathematical relationship between “Avg. No. Concurrent Sessions During Peak Hours” and “Average session duration.”
- l. Please confirm that “Avg. No. Concurrent Sessions During Peak Hours” is inversely proportional to “Peak Usage Period Hours” —that is, doubling the latter would halve the former. If you do not confirm, please state the mathematical relationship between “Avg. No. Concurrent Sessions During Peak Hours” and “Peak Usage Period Hours.”


OCA/USPS-T3-10. Please refer to USPS-LR-1/MC98-1, page 6. You show “Peak Usage Period Hours” of 4. You state, “No peak usage period has been observed during the operation test, but must be considered to plan for maximum capacity: 1PM-5PM EST is assumed here.”

- a. Please confirm that for purposes of your analysis, only the length of the peak period matters; i.e., the actual time of day (1PM-5PM EST) makes no difference. If you do not confirm, please explain.
- b. If the 4-hour figure was chosen on some basis other than randomness, please state that basis.

- c. Please confirm that the shorter the chosen duration of the peak period the lower the probability that all access ports are in use when an MOL customer attempts to transmit a job (because a shorter duration produces a higher number of access ports under your analysis). If you do not confirm, please explain.
- d. Please confirm that under your analysis, all access ports will be in use for the entire peak period of four hours. If you do not confirm, please explain.
- e. Please confirm that the length of time during which all ports are busy during a given 24 hours is virtually certain to be much less than four hours in 1999. If you do not confirm, please explain.
- f. Are there any data available from the operations test that would shed light on the likely length of the peak period? If so, please supply those data.

#### 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  
August 3, 1998