

ORIGINAL

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

RECEIVED

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MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS GARVEY TO INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS PLUNKETT
(OCA/USPS-T5-3)

The United States Postal Service hereby provides the response of witness Garvey to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T5-3, filed on July 22, 1998, and redirected from witness Plunkett.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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August 3, 1998



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OCA/USPS-T5-3. Please refer to page 15, lines 11-13. You state that "Postal Service software used for Mailing Online will ensure that all Mailing Online volume is sorted in conformity with the most current sort plans available, and with the greatest possible depth."

- a. During the operational test period, what sort plan was used to sort Mailing Online?
- b. During the operational test period, at what postal facility was Mailing Online entered?
- c. During the operational test period, did some Mailing Online pieces receive an outgoing primary sort at the facility referred to in part (b) of this interrogatory? If so, what proportion?
- d. During the operational test period, did some Mailing Online pieces receive a sort other than an outgoing primary sort at the facility referred to in part (b) of this interrogatory? If so, what proportion?
- e. During the operational test period, did some Mailing Online pieces receive a dispatch without piece sorting at the facility referred to in part (b) of this interrogatory? If so, what proportion?
- f. During the operational test period, were some Mailing Online pieces entered in trays at the facility referred to in part (b) of this interrogatory? If so, what proportion of pieces?
- g. During the operational test period, were some Mailing Online trays consolidated prior to dispatch from the facility referred to in part (b) of this interrogatory? If so, what proportion of pieces?
- h. During the market test and experimental periods, will the Postal Service collect data responsive to this interrogatory at the facilities where Mailing Online is entered? If not, please explain why not.
- i. Since the commencement of the operational test period, on how many days have Mailing Online pieces been transmitted electronically to the facility referred to in part (b) of this interrogatory? On how many days have there been no transmissions?
- j. Please provide a frequency distribution showing the number of days on which 0, 1, 2, etc., electronic transmissions of Mailing Online pieces have been made to the facility referred to in part (b) of this interrogatory since the commencement of the operational test period.
- k. Please provide a tabulation showing the volume of Mailing Online pieces broken down by number of transmissions 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 this interrogatory on days when 1, 2, 3, etc., transmissions were made.

RESPONSE:

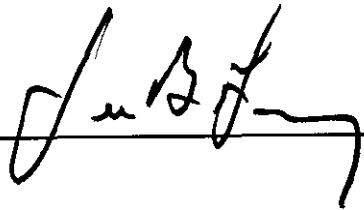
- a. The sort plan used is that which is provided in the commercial presort software module integrated into the Mailing Online system.

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- b. Mailing Online mail has been entered through the Dallas, Texas P&DC Business Mail Entry Unit (BMEU). However, primary processing was not performed at this plant since the mail was prepared for immediate drop shipping to plants at Tampa, Florida and/or Hartford, Connecticut.
- c-e. As explained above and in my response to OCA/USPS-T5-17, the mail was drop shipped to other facilities. I have no knowledge of sorts received by the mail at those facilities and since the essence of Mailing Online is electronic induction of mail, no reason to inquire. However, I do know that no exceptional handling was requested.
- f. I have no knowledge of the containerization of the mail beyond that it was prepared in pouches labeled for drop shipment.
- g. I have no knowledge of any tray consolidation prior to drop shipment dispatch from the Dallas, Texas P&DC.
- h. To the extent deemed desirable and necessary for operational analysis, sort and dispatch data will be collected at the facilities where Mailing Online is entered during the market test and experimental periods.
- i-k. The available information regarding Mailing Online activity appears as Exhibit 1 to Response to OCA/USPS-T1-10.

DECLARATION

I, Lee Garvey, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.




A handwritten signature in black ink, appearing to read "Lee Garvey", is written over a horizontal line.

Dated: August 3, 1998

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Kenneth N. Hollies

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