ORIGINAL

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

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MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS GARVEY TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T1-13-18)

The United States Postal Service hereby provides responses of witness Garvey to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T1-13-18, filed on July 24, 1998.

Each 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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T1-13. Please refer to your testimony at page 1, lines 10-13.

a. Please confirm that the "World Wide Web-based software application" was developed by a firm under contract to the Postal Service. If you do not confirm, please explain.

b. Please provide a copy of the contract between the Postal Service and the firm referred to in part (a) of this interrogatory.

c. Please provide a copy of the Request for Proposals (RFP) or other document soliciting bids from firms interested in developing the World Wide Web-based software application.

RESPONSE:

a. Confirmed.

b. See USPS-LR-7/MC98-1.

c. The requested RFP is embodied in USPS-LR-7/MC98-1, since the contract is a copy of the RFP with the blanks filled in.

OCA/USPS-T1-14. Please refer to your testimony at page 6, lines 5-6. During the expanded (market) test period, please describe the means by which the Postal Service plans to provide equal access to all potential users in the three metropolitan areas constituting the geographic area of the market test, pursuant to 39 CFR 3001.162(h).

RESPONSE:

Mailing Online access will be provided via the World Wide Web. All potential users will have access via this universally available feature of the internet.

OCA/USPS-T1-15. Please refer to your testimony at page 10, lines 15-18.

a. Please explain the phrase "like printing and finishing options."
b. Please explain the phrase "batch address file."
c. Please confirm that two types of files will be transmitted to the commercial printers, 1) a print file containing documents having like printing and finishing options and 2) the batch address file. If you do not confirm, please explain.
d. Please explain the process by which commercial printers will utilize the batch address file so that Mailing Online mail pieces will be "presorted to the maximum depth of sort."

RESPONSE:

a. The Mailing Online "electronic job ticket" printing and finishing specifications (see my testimony at page 10, lines 6-8) are the determinants of "like printing and finishing options" for merging and batching.

b. A "batch address file" is the address file component of the two parts necessary for a printer to produce mailpieces, i.e. documents and addresses. It contains information matching addresses to document files (for subsequent routing and delivery of printed documents) and batch identification information to allow the accurate batching of documents.

c. Two types of files are transmitted: 1) individual document files, and 2) batch address files.

d. Since all sortation occurs at the system level, prior to transmission to the printer, each batch address file is fully presorted upon its receipt by the printer.

OCA/USPS-T1-16. Please refer to your testimony at page 10, lines 18-21. Please confirm that one finishing option for Mailing Online customers is mail pieces without envelopes. If you do not confirm, please explain.

RESPONSE:

Confirmed. A self-mailer option is expected to be introduced for the experimental period, but will not be available during the market test.

OCA/USPS-T5-17 [*sic*]. Please refer to Exhibit USPS 1A, "Mailing Online Process Diagram." One of the boxes in that diagram is entitled "Mailing Online System Merge and Batch."

a. One of the tasks under Merge and Batch is "Batches mailpieces with similar job characteristics." During the operations test, what is the maximum number of possible categories of batches? I.e., How many *different* categories of "job characteristics" are there? How is each category defined in the System software? Please provide a copy of the lines of code that perform this task.

b. Please provide the following volume information from the operations test. Separately for each possible category of "job characteristics," provide (i) total volume to date, (ii) maximum batch volume to date, (iii) minimum batch volume to date, (iv) average volume per batch to date.

c. One of the tasks under Merge and Batch is "Batches mailpieces by delivery destination." Please define "delivery destination." If this does not mean "entry facility," please explain. During the operations test, what is the maximum number of possible delivery destinations? How is each possible delivery destination defined in the System software? Please provide a copy of the lines of code that perform this task.

d. Please provide the following volume information from the operations test. Separately for each possible "delivery destination," provide (i) total volume to date, (ii) maximum batch volume to date, (iii) minimum batch volume to date, (iv) average volume per batch to date.

e. One of the tasks under Merge and Batch is "Presorts batches to finest level." During the operations test, is there a minimum size presort batch, e.g., one full tray? Does "finest level" mean presorting to the same depth as would the entry facility prior to dispatch? Does "finest level" mean presorting to the same depth as would a presort mailer depositing First-Class Mail at the entry facility? Please explain.

f. During the operations test, did the System software use more than one sort scheme to "Presort[] batches to finest level"? E.g., did sort schemes vary by day of the week, day of the month, or season of the year? During the operations test, did the entry facility in Texas use more than one outgoing sort scheme? E.g., did sort schemes vary by day of the week, day of the month, or season of the year? Please explain how the sort scheme(s) used by the System software were matched or otherwise coordinated with the sort scheme(s) used at the entry facility in Texas.

g. One of the tasks under Merge and Batch is "Transfers data files to print site servers." During the operations test, is there a cutoff time prior to which this task must be completed each day? If not, why not? If so, how is this cutoff time determined? If so, please provide a copy of the lines of code in the System software that enforce this cutoff time.

RESPONSE:

a. A precise answer to this question is difficult. I have calculated that during the operations test, for regular mail-merge mailing with on-line proofing, there are 75 possible categories of batches within each possible page count combination. The system software defines batches based upon page count, paper size, bindery options, plex options, spot color options and proofing options. Also, non-merge jobs are currently defined as separate batches, as are fax-back and mail-back proofing requests.

The code that determines the batch for a specified job, plus the delivery destinations based on the addressee ZIP Codes is reproduced below.

```
MainMenu.Label1.Caption = "Opening Job Template" DoEvents

Erase sData
iCnt = 0: QjobDoc = 0: QjobMail = 0

iFileNum = FreeFile
Open cJobInDir & sTextFile For Input As iFileNum Do While Not EOF(iFileNum)
iCnt = iCnt + 1
Input #iFileNum, sData(iCnt)
Loop
Close iFileNum


'************************************************************************** '
Determine the eligible print sites for the job based on whether or not the '
  job is spot color or B&W
'**************************************************************************
qStr = "color_zip_lo >= 000 "
If sData(7) = "CLRD" Then
sData(7) = "None"
qStr = "black_zip_lo >= 000 "
End If

gblSiteCnt = 0
Erase gblBatches
Set RdoJob = rdoNetPost.OpenResultset("SELECT * FROM print_site",
rdOpenDynamic, rdConcurRowVer)
RdoJob.MoveFirst
Do While Not RdoJob.EOF
```

```
gblSiteCnt = gblSiteCnt + 1
gblBatches(gblSiteCnt, 3) = RdoJob("print_site_code") &
Format$("000000")
gblBatches(gblSiteCnt, 4) = 0
gblBatches(gblSiteCnt, 5) = 0
gblBatches(gblSiteCnt, 6) = RdoJob("print_site") gblBatches(gblSiteCnt, 7) =
RdoJob("user_id") gblBatches(gblSiteCnt, 8) = RdoJob("password")
RdoJob.MoveNext
Loop
RdoJob.Close

'*************************************************************************** '
Determine the zip code (destination) ranges for each eligible print site
'***************************************************************************
For siteLoop = 1 To gblSiteCnt
Set RdoJob = rdoNetPost.OpenResultset("SELECT * FROM print_site_zips
WHERE print_site_code = '" & Left$(gblBatches(siteLoop, 3), 2) & "'",
rdOpenDynamic, rdConcurRowVer)
RdoJob.MoveFirst
zCntr = 0
Do While Not RdoJob.EOF
zCntr = zCntr + 1
If sData(7) = "None" Then
gblBZips(siteLoop, zCntr, 1) = RdoJob("black_zip_lo") gblBZips(siteLoop, zCntr,
2) = RdoJob("black_zip_hi")
Else
gblBZips(siteLoop, zCntr, 1) = RdoJob("color_zip_lo") gblBZips(siteLoop, zCntr,
2) = RdoJob("color_zip_hi")
End If
RdoJob.MoveNext
Loop
gblBZips(siteLoop, 0, 0) = zCntr
Next

'*************************************************************************** '
Determine the doc and mail id
'***************************************************************************
Set RdoJob = rdoNetPost.OpenResultset("select * from job where job_id = " &
Val(JobTemplate), rdOpenDynamic, rdConcurRowVer)

RdoJob.MoveFirst
QjobDoc = RdoJob("job_doc")
QjobMail = RdoJob("job_mail")
gblProof = RdoJob("Job_Proof")
gblMemID = RdoJob("Job_Emp")
gblTtlMail = RdoJob("Job_Page")
```

```
RdoJob.Close

gblMailMerge = False

'*************************************************************************** '
Determine the whether the job is merge or non-merge and page count
'***************************************************************************
Set RdoJob = rdoNetPost.OpenResultset("select * from doc where doc_id = " &
QjobDoc, rdOpenDynamic, rdConcurRowVer)
RdoJob.MoveFirst
QfileDoc = RdoJob("Doc_Name")
gblJobApp = RdoJob("Doc_App")
ImpCnt = RdoJob("Doc_Page")
gblDocPgCnt = RdoJob("Doc_Page")
If UCase$(RdoJob("Doc_Merge")) = "YES" Then
gblMailMerge = True
End If
RdoJob.Close

If gblDocPgCnt < 2 Then
gblDocPgCnt = 2
End If

'*************************************************************************** '
Determine the job plex
'***************************************************************************
If UCase$(Mid$(sData(6), 1, 3)) <> "ONE" Then
ImpCnt = CInt(ImpCnt / 2)
End If

'*************************************************************************** '
Set envelope size based on the page size and page count
'***************************************************************************
'Set envelope size based on the page size and page count sData(12) =
"White#10(9*4)"
If ImpCnt > 5 Then
sData(12) = "White#?(82/4*12)"
Else
If sData(9) = "11*17" Then
If ImpCnt > 2 Then
sData(12) = "White#?(82/4*12)"
End If
End If
End If

'***************************************************************************
```

```
'If the job is to be sent to recipients on the mail list:
'   check plex, mail class, paper size, color, binding, envelope style.
'   encvelope size, fold type, Merge vs Non-merge and Document page count '
'  If the job is a mail merge find all open batches and use the corresponding '
Batch IDs if all charateristics mentioned above are the same
'  Else create new Batch IDs for all print sites '
' If the job is a non-merge job
'  create new Batch IDs for all print sites '
' If the job is a FAX BACK or MAIL BACK then create a unique set of Batch IDs '
for the job
'*************************************************************************
If UCase$(gblProof) = "VIEW ONLY" Then
If gblMailMerge Then

xSelStr = "Status = 'O' And MailClass = '" & sData(10) & _
'" And MailSize = " And plex = '" & sData(6) & _ '" And size = '" & sData(9) & _
'" And color = '" & sData(7) & _
'" And binding = '" & sData(8) & _
'" And env_style = '" & sData(5) & _ '" And env_size = '" & sData(12) & _ '" And
fold = '" & sData(13) & _
'" And DocMerge = " & gblMailMerge & _ " And PageCnt = " & ImpCnt & " ;"

Set rsJob = dbpomdata.OpenRecordset("Select * From Batch Where " &
xSelStr)

If rsJob.RecordCount > 0 Then
rsJob.MoveFirst
Do While Not rsJob.EOF
For lLoop = 1 To gblSiteCnt
If Mid$(rsJob("Batch"), 1, 2) = Mid$(gblBatches(lLoop,
3), 1, 2) Then
gblBatches(lLoop, 3) = rsJob("Batch") gblBatches(lLoop, 5) = 1
lLoop = gblSiteCnt
End If
Next
rsJob.MoveNext
Loop
End If
rsJob.lose

End If
End If

For lLoop = 1 To gblSiteCnt
If Val(Mid$(gblBatches(lLoop, 3), 3, 6)) = 0 Then
Set rsJob = dbpomdata.OpenRecordset("SELECT Batch From Batch WHERE
```

```
Mid$(Batch,1,2) = "' & Mid$(gblBatches(lLoop, 3), 1, 2) & "' ORDER BY Batch ;")
If rsJob.RecordCount > 0 Then
rsJob.MoveLast
gblBatches(lLoop, 3) = Mid$(gblBatches(lLoop, 3), 1, 2) &
Format$(Val(Mid$(rsJob("Batch"), 3, 6)) + 1, "000000")
Else
gblBatches(lLoop, 3) = Mid$(gblBatches(lLoop, 3), 1, 2) &
Format$(1, "000000")
End If
rsJob.Close
End If
Next

*****************************************************************************
*********************************************
```

b. To the extent the requested information is available, it appears in USPS-LR-6/MC98-1.

c. Address ZIP Codes are used to determine "delivery destination" which refers to the ranges of ZIP Codes assigned to respective print sites. Printing contractors will be required to deliver finished mail pieces to specified mail entry units. During the operations test, one physical print site receives all batches; however the system distinguishes two virtual print sites (to test ZIP Code routing) and two separate servers at the physical print site, each representing a range of ZIP Codes. The code that accomplishes these tasks is reproduced below.

```
'*****************************************************************************
' Determine the zip code (destination) ranges for each eligible print site
'*****************************************************************************
For siteLoop = 1 To gblSiteCnt
Set RdoJob = rdoNetPost.OpenResultset("SELECT * FROM print_site_zips
WHERE print_site_code = "' & Left$(gblBatches(siteLoop, 3), 2) & "'",
rdOpenDynamic, rdConcurRowVer)
RdoJob.MoveFirst
zCntr = 0
```

```
Do While Not RdoJob.EOF
zCntr = zCntr + 1
If sData(7) = "None" Then
gblBZips(siteLoop, zCntr, 1) = RdoJob("black_zip_lo") gblBZips(siteLoop, zCntr,
2) = RdoJob("black_zip_hi")
Else
gblBZips(siteLoop, zCntr, 1) = RdoJob("color_zip_lo") gblBZips(siteLoop, zCntr,
2) = RdoJob("color_zip_hi")
End If
RdoJob.MoveNext
Loop
gblBZips(siteLoop, 0, 0) = zCntr
Next
```

d. To the extent the requested information is available, it appears in USPS-LR-6/MC98-1.

e. Each batch is presorted individually regardless of volume. Using a commercial presort software module, each batch is analyzed for presort potential and handled accordingly, with whatever sortation possible being performed to the finest level according to standard Postal Service First-Class Mail classification rules

f. The same commercial software was used to perform all sorts performed by the system software. I am unaware of more than one sort scheme being used. The mail entered at the Texas facility was not processed there. To simulate multiple print sites close to users' origination points, prepared mailings ("delivery destination" batches) have been drop shipped to the Tampa and Hartford plants. No coordination has been attempted between sort schemes at these facilities and the system sort.

g. Data file transfers occur at two times:

1. document print files are transferred immediately upon completion of a customer transaction,

2. batched address files are transferred at a specified cutoff time each day. Currently this cutoff is 2:00 PM Eastern Time. The pertinent code is reproduced below.

```
*****************************************************************************
**********************************************
Code to enforce Cutoff Time.

'*****************************************************************************
********** ' At midnight every day an ACCESS database is updated to indicate
that the daily processes ' for the day have not been run. There are two daily
processes - ' ' 1 - the daily maintenance program which runs at midnight AND ' '
2 - the daily cutoff (1400 EST) which prepares the batches for compilation and '
distribution ' ' This code executes if the system time is greater than 1400 and the
process has not ' been previously run (gblNPProc is 0). It runs only once a day.


If CompTime >= gblNPTime Then
If gblNPProc = "0" Then
Set xTmClock = dbpomdata.OpenRecordset("TmClock") xTmClock.MoveFirst
xTmClock.Edit
xTmClock("NPSort Proc") = "1"
xTmClock.Update
xTmClock.Close

pwDate = Format$(Date, "yyyy/mm/dd") On Error Resume Next
FileCopy cLogDir & "pw.dat", cLogDir & "pw" & _
Mid$(pwDate, 6, 2) & Mid$(pwDate, 9, 2) & ".dat"
FileCopy cLogDir & "pwe.dat", cLogDir & "pw.dat" On Error GoTo 0
NPVal = Shell("c:\netpost\src\npmain\npmain.EXE", 4) DoEvents
For iLoop = 1 To 500          'Give NP SORT time to start and
DoEvents                    ' close out all active batches
Next
Unload Me
End
End If
End If
h.      ---------------------------------------------------------------------------
```

OCA/USPS-T1-18. Please refer to Exhibit USPS 1A, "Mailing Online Process Diagram." One of the boxes in that diagram is entitled "Job Approval And Payment Authorization." During the operations test, are Mailing Online customers informed prior to job approval when their jobs will be printed, entered into the mailstream, or dispatched from the entry facility? If not, why not? If so, please provide a copy of the lines of code in the System software that perform this task. Does the Postal Service offer any assurance or estimate of the probability that a particular job will be dispatched from the entry facility on the same day the job is approved? If not, why not? If so, what is the basis for this assurance or estimate?

RESPONSE:

Mailing Online customers are informed at the time of job submission, prior to final approval, what the expected mailing date will be for their job. This date is calculated based upon the system daily cutoff time of 2:00 PM ET, the current time, and the day of the week and date of the next postal business day. No information is provided at this time regarding dispatch from the entry facility. This is intended to keep current expectations regarding dispatch of First-Class Mail intact. The pertinent code is reproduced below.

2) Cutoff Time

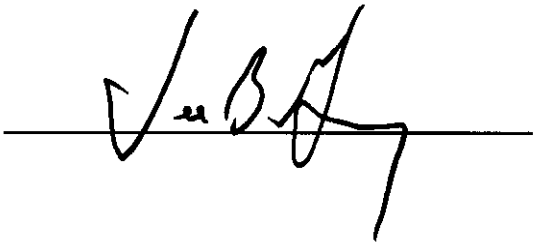
```
'*****************************************************************************
********** ' At midnight every day an ACCESS database is updated to indicate
that the daily processes ' for the day have not been run. There are two daily
processes - ' ' 1 - the daily maintenance program which runs at midnight AND ' '
2 - the daily cutoff (1400 EST) which prepares the batches for compilation and '
distribution ' ' This code executes if the system time is greater than 1400 and the
process has not ' been previously run (gblNPProc is 0). It runs only once a day.


If CompTime >= gblNPTime Then
If gblNPProc = "0" Then
Set xTmClock = dbpomdata.OpenRecordset("TmClock") xTmClock.MoveFirst
xTmClock.Edit
xTmClock("NPSort Proc") = "1"
xTmClock.Update
xTmClock.Close
```

```
pwDate = Format$(Date, "yyyy/mm/dd") On Error Resume Next
FileCopy cLogDir & "pw.dat", cLogDir & "pw" & _
Mid$(pwDate, 6, 2) & Mid$(pwDate, 9, 2) & ".dat"
FileCopy cLogDir & "pwe.dat", cLogDir & "pw.dat" On Error GoTo 0
NPVal = Shell("c:\netpost\src\npmain\npmain.EXE", 4) DoEvents
For iLoop = 1 To 500          'Give NP SORT time to start and
DoEvents                      ' close out all active batches
Next
Unload Me
End
End If
End If
```

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.



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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August 3, 1998