

ORIGINAL

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. MC98-1

Mailing Online Service )

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: DANIEL STIREWALT  
(OCA/USPS-T3-11-16)  
(August 4, 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

Emmett Rand Costich  
Acting Assistant Director



OCA/USPS-T3-11. Please refer to USPS-LR-1/MC98-1, Attachment 1, pages 6 and 7. For the year 1999, please explain the difference between the figure 839964.69, "Average Bytes Per Incoming Customer Transmission," and the figure 30720, "Number of Bytes Per Mailing Piece Transaction."

OCA/USPS-T3-12. Please refer to USPS-LR-1/MC98-1, Attachment 1, page 7. In the line, "Number of Mail Pieces Per Business Day," you assumed 312 business days per year, while witness Seckar assumed 302 business days per year. See USPS-T-2, Exhibit A, page 11. Please explain why there is a difference between the number of business days assumed by you and witness Seckar.

OCA/USPS-T3-13. Please refer to USPS-LR-1/MC98-1, Attachment 1, page 7. Please define "mail merge jobs" and "non mail merge jobs."

OCA/USPS-T3-14. Please refer to USPS-LR-1/MC98-1, Attachment 1, page 11, concerning the Technical Help Desk Resource Years.

- a. In the line "Total First Time Call Hours," please confirm that the factor 1.5 "to account for customer turn over" was obtained during the Mailing Online operational test period from
  - i. sampling data;
  - ii time-series data, or;
  - iii. personal observation.

If you do not confirm, please explain.

- b. In the line "Total First Time Call Hours," please confirm that the 0.5 hour "estimate for initial call" was estimated from experience during the Mailing Online operational test period from
- i. sampling data;
  - ii time-series data, or;
  - iii. personal observation.

If you do not confirm, please explain.

- c. Please confirm that an increase in the 0.5 hour "estimate for initial call" would increase the estimated fixed costs to the Postal Service for Mailing Online service. If you do not confirm, please explain.
- d. Please identify where the figures in the line "Total First Time Call Hours" are used in Attachment 2: Detailed Cost Estimates of USPS-LR-1/MC98-1.

OCA/USPS-T3-15. Please refer to USPS-LR-1/MC98-1, Attachment 1, page 11, concerning the Technical Help Desk Resource Years.

- a. In the line "Total On-going calls hours," please define "on-going calls."
- b. In the line "Total On-going calls hours," please confirm that the 0.1 hour "estimate for on-going calls" was estimated from experience during the Mailing Online operational test period from
- i. sampling data;
  - ii time-series data, or;

iii. personal observation.

If you do not confirm, please explain.

c. In the line "Total On-going calls hours," please confirm that the estimate of "3 calls average per year" was obtained during the Mailing Online operational test period from

i. sampling data;

ii. time-series data;

iii. personal observation, or;

iv. marketing survey.

If you do not confirm, please explain.

d. Please confirm that an increase in the 0.1 hour "estimate for on-going calls" would increase the estimated fixed costs to the Postal Service for Mailing Online service. If you do not confirm, please explain.

e. Please identify where the figures in the line "Total On-going call hours" are used in Attachment 2: Detailed Cost Estimates of USPS-LR-1/MC98-1.

OCA/USPS-T3-16. Please refer to USPS-LR-1/MC98-1, Attachment 1, page 11, concerning the Technical Help Desk Resource Years. In the line "Percentage of customer calls requiring technical help," it states that "Experience during the pilot indicates that this percentage is low, but 50% is assumed for capacity planning."

a. Please provide the actual percentage of customer calls requiring technical help during the "pilot."

- b. Please provide the rationale for assuming only 50 percent of customer calls would require technical help.
- c. Please confirm that the "Percentage of customer calls requiring technical help" is used to estimate the fixed costs of the Mailing Online service. If you do not confirm, please explain.
- d. Please confirm that a percentage greater than 50 percent of customer calls requiring technical help would increase the estimated fixed costs to the Postal Service for Mailing Online service. If you do not confirm, please explain.

#### 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 4, 1998