

ORIGINAL

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

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OFFICE OF THE SECRETARY  
OFFICE OF THE POSTAL RATE COMMISSION

Mailing Online Service )

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: LEE GARVEY  
(OCA/USPS-T1-23-27)  
(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-T1-23. Please refer to your testimony at page 1, footnote 2. You state, "The Postal Service will provide full service access via the World Wide Web, using browser functions in lieu of user-installed software."

- a. Please describe in detail how a Mailing Online customer would transmit a Word document "via the World Wide Web, using browser functions in lieu of user-installed software" during (i) the operations test period, (ii) the market test period, (iii) the experimental period, (iv) the post-experiment period.
- b. Please reconcile your testimony with the following. "The Postal Service's preferred objective for this experiment is to have it recommended by the Commission by the end of November, 1998. This would allow the Postal Service to explore the possibility that major software developers could integrate Mailing Online into impending updates of software in order to make the service widely and easily available . . . ." Motion of the USPS for Expedition . . . , July 15, 1998. In particular, why is such integration necessary if "full service access via the World Wide Web" is available "using browser functions in lieu of user-installed software"?
- c. Please explain how "integrat[ing] Mailing Online into impending updates of software [would] make the service [more] widely and easily available."

OCA/USPS-T1-24. Please refer to Exhibit 1 to your response to interrogatory OCA/USPS-T1-10.

- a. For each date on which more than one transaction occurred, please provide the number of different mailers who transmitted on that date and the volume transmitted on that date by mailer.
- b. Please provide the total number of different mailers who have utilized Mailing Online during the period covered by Exhibit 1.
- c. For each separate mailer who has utilized Mailing Online during the period covered by Exhibit 1, please provide the total number of transactions that occurred during the period covered by Exhibit 1 and the dates on which those transactions occurred. (It is not necessary to identify mailers; merely differentiate them.)
- d. For each separate mailer who has utilized Mailing Online during the period covered by Exhibit 1, please provide the total number of transactions that occurred in each calendar month during the period covered by Exhibit 1.
- e. For each separate mailer who has utilized Mailing Online during the period covered by Exhibit 1, please provide the average number of transactions per calendar month during the period covered by Exhibit 1.

OCA/USPS-T1-25. Please refer to your response to interrogatory OCA/USPS-T1-3(b)-(f). You state, "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."

- a. Please define "drop shipping" as used here.
- b. Please confirm that some shipments to Tampa contained "calendars to customers in Chicago and other cities around the country . . . ." USPS-T-7 at 2, line 4. If you do not confirm, please explain.
- c. Does the Dallas P&DC routinely prepare dispatches to Tampa and Hartford as part of its outgoing sort plan? If not, to where would Dallas routinely dispatch pieces destined for Tampa or Hartford?
- d. You state "that no exceptional handling was requested" for Mailing Online mail entered through the Dallas P&DC. Please define "exceptional handling."
- e. You state that Mailing Online mail "was prepared in pouches labeled for drop shipment." Please describe all transportation received by these pouches, including the origin and destination of each leg, from the time the pouches are dispatched from the Dallas P&DC.

OCA/USPS-T1-26. Please refer to your response to OCA/USPS-T1-2. Please explain the rationale for having the Postal Service hold the permits on which the mailings are submitted.

OCA/USPS-T1-27. Please refer to your response to OCA/USPS-T1-3(d). Please provide a copy of the pages which will have prices entered upon them, and any other pages that are changed, from USPS-LR-5/MC98-1 once signatures are affixed.

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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

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August 4, 1998