

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Mailing Online Service)

Docket No. MC98-1

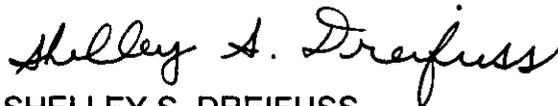
OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: LEE GARVEY
(OCA/USPS-T1-28-30)
(August 6, 1998)

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



SHELLEY S. DREIFUSS
Attorney

OCA/USPS-T1-28. Please refer to your response to OCA/USPS-T1-11(a) and (b).

- a. Please identify the "portions" of the three stated metropolitan areas that are part of the market test area.
- b. Please explain whether the "portions" of the three stated metropolitan areas that are part of the market test are defined in terms of geography, organization, or some other manner. Please describe the "portions" in detail.
- c. Please explain whether the "review" of the geographic areas suitable for the test expansion consisted of a market survey, a report prepared by or for the Postal Service, or some other analysis. Please describe the review in detail.

OCA/USPS-T1-29. Please refer to your response to OCA/USPS-T1-12.

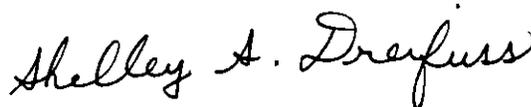
- a. Please explain how the number of market test participants will be "limited to several thousand."
 - i. Does the Postal Service presently possess, or is it in the process of preparing, a list of "several thousand" market test participants? If so, please provide the list.
 - ii. Will the several thousand market test participants be "limited" by their geographic location? Please explain.
 - iii. Will the several thousand market test participants be "limited" as a consequence of their association with one or more organizations? If so, please name the organization and provide the list of participants.

- b. Please identify and provide the costs associated with "informing potential customers or advertising the availability of Mailing Online service during the expanded (market) test period."
- c. Please identify the table(s) in the testimony of witness Seckar, and the attachment(s) and page number(s) in the testimony of witness Stirewalt, containing the costs of "informing potential customers or advertising the availability of Mailing Online service during the expanded (market) test period."

OCA/USPS-T1-30. Please refer to your testimony at page 1, lines 11-12. In the year 2001, please identify how many 5-digit ZIP Codes will be within the geographic area of each commercial print site.

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.



SHELLEY S. DREIFUSS
Attorney

Washington, D.C. 20268-0001
August 6, 1998