Before The POSTAL RATE COMMISSION RECEIVED WASHINGTON, D.C. 20268-0001 PUS 10 4 11 777 TO

Mailing Online Service	Mailing	Online	Service	
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Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CAMPANELLI TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS-T8-3-11)

The United States Postal Service hereby provides the response of witness Campanelli to the following interrogatories of Office of the Consumer Advocate: OCA/USPS-T8-3-11, filed on July 31, 1998.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Kenneth N. Hollies

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OCA/USPS-T8-3. Please refer to page 3 of your testimony. You state that you can now get your entire mailing completed in about two hours. Please describe the steps you take during that two-hour period to prepare and complete your transaction with the Postal Service.

RESPONSE:

I update my flyer, prepare my mailing list – which consists of assembling the batch of names I want to contact, and transmit these materials to the Post Office.

OCA/USPS-T8-4. You state at page 3 of your testimony that Mailing Online has made it easy to clean your address lists.

- a. Does the Postal Service require you to "clean" your mailing list?
- b. How were you able to determine that some addresses were bad? Please explain.
- c. Mailing Online uses the First-Class Mail Stream and those mailers sent to bad addresses are returned.
- d. How has Mailing Online made it easy for you to clean your lists?

- a. No.
- Mailing Online (operations test) uses First-Class Mail so mail pieces sent
 to bad addresses are returned to me.
- c. When mail is returned, I eliminate the bad addresses from my lists.
- d. When mail is returned, I eliminate the bad addresses from my lists.

OCA/USPS-T8-5. You state at lines 17-18 of page 3 that the ability to clean your lists is coming at a good time. Please explain specifically what this "ability" consists of?

- a. Do you mean that *you* now have the ability to clean the mailing lists of that the Postal Service cleans them for you? Please explain.
- b. If you are the one with the ability, describe in detail how you clean your lists.
- c. If the Postal Service cleans your lists, does it charge for that service?
- d. If a fee is charged, what is the fee?
- e. What does the Postal Service do to clean your lists, i.e. how have your lists been improved after the service has been provided?
- f. Can you obtain the "cleaning" service without participating in Mailing Online?

- a. I have the ability to clean my mailing lists because the pieces with bad addresses are returned allowing me to purge them from my mailing list, or to replace them with good addresses.
- b. When the mail pieces with bad addresses are returned to me, I access the mailing list on my computer and correct the entry by purging the bad information, correcting the addresses or correcting the name of the residents.
- c. Not applicable
- d. Not applicable
- e. Not applicable
- f. Since I clean my own lists I have not looked into this.

OCA/USPS-T8-6. Please explain how you transmit your electronic files to the Postal Service.

- a. Do you transmit the direct mail document and mailing list to the Postal Service by means of e-mail?
- b. If so, do you attach the electronic files for the direct mailing and the mailing list to an e-mail message? Do you paste the electronic direct mailing information and electronic mailing list information into an e-mail message? Please explain.
- c. Have you found that there is any incompatibility in the software you use to generate the direct mailing and mailing list and the software used by the Postal Service to receive and produce your mail. Please explain.
- d. Do you upload electronic files for the direct mail piece and the mailing lists to a Postal Service site on the Internet? Please explain.

- a. No, I upload them directly to a Web site.
- b. Not applicable.
- c. No.
- d. Yes, through a very easy-to-use step-by-step Web site.

OCA/USPS-T8-7. How did you learn to use Mailing Online?

- a. Did a Postal Service representative come to your place of business to work with you?
- b. Did you have consultations over the phone?
- c. Were you given written materials explaining how to use the service? If so, provide copies of any written explanatory materials.
- d. How long did it take you to become proficient in using Mailing Online?
- e. Please give a detailed explanation in responding to the 5 questions comprising this interrogatory.

RESPONSE:

As I stated in my testimony, I have an interest in technology and a capacity to master hi-tech tools. This interest and capacity enabled me to learn how to use Mailing Online in a short period of time.

- a. No.
- b. No.
- c. No.
- d. 30 minutes.
- e. See above.

OCA/USPS-T8-8. You state at page 3 that, prior to using Mailing Online, preparing your direct mailing required approximately 1 to 1 ½ days of your time. Did you ever consider having an outside entity prepare the mailing so as to avoid the drain on your time? If you did, why did you rule out that alternative?

RESPONSE:

I used to use a fulfillment service for larger mailings, but found them unreliable and not to my overall liking. As one can see from the relevant nature of my mailing to specific neighborhoods, the numbers are small, and it became easier to do them myself, up to 2000 pieces per mailing.

OCA/USPS-T8-9. On page 2 of your testimony you state that you have been using Mailing Online since June 3, 1998. However, on page 4, you state that you have been participating in the test for 4 months. Since your testimony was filed on July 15, 1998, this would not appear possible. Please reconcile these two statements.

RESPONSE:

I was under the impression that my testimony would be presented officially to the Commission in September and I was projecting ahead in my written testimony.

The statement on page 2 is correct.

OCA/USPS-T8-10. On page 4 you refer to the "tools provided by Mailing Online." Please describe the "tools" you are referring to.

RESPONSE:

I refer to the ability provided by Mailing Online to simplify the user's direct mail tasks and supply professional direct mail pieces in a cost-efficient manner.

OCA/USPS-T-8-11. On page 3 you state that the "people involved with Mailing Online...follow up dutifully" whenever you have a question about the service.

- a. Please state the names and positions of the "people" with whom you have had contact concerning Mailing Online.
- b. What methods are used by postal personnel to follow up on your questions, e.g., telephone, e-mail, mail, in-person visits, etc? Please explain in detail.

- a. I spoke to a variety of helpful people, including Ms. Holly Bodycoat, but I did not inquire as to each and every name and position during these conversations.
- b. Telephone and e-mail.

DECLARATION

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

Dated: 8 //0/7

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

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 August 10, 1998