

ORIGINAL

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

RECEIVED
AUG 13 1 55 PM '98
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Mailing Online Service)

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: LEE GARVEY
(OCA/USPS-T1-31-39)
August 13, 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.

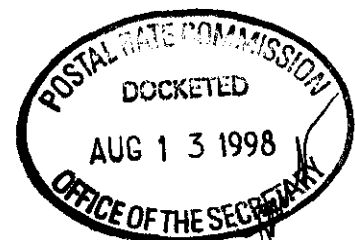
Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Shelley S. Dreifuss

SHELLEY S. DREIFUSS
Attorney



OCA/USPS-T1-31. Please refer to your testimony at page 2, line 7, concerning address hygiene.

- a. Please explain the phrase "address hygiene."
- b. Please describe the activities of the computer network control center to provide "address hygiene" for Mailing Online customers.

OCA/USPS-T1-32. Please refer to your testimony at page 9, lines 18-20.

- a. Please provide the internet address to be used by Mailing Online customers during the expanded (market) test.
- b. Also, please provide the internet address currently in use during the operations test. Witness Wilcox refers to it as "PostOffice Online. See response to interrogatory OCA/USPS-T7-5.

OCA/USPS-T1-33. Please refer to your testimony at pages 9 and 10, lines 10-20, and 1-10, respectively.

- a. Please confirm that during the expanded (market) test, an individual customer, located within one (or more) of the three metropolitan areas, that seeks to use the Mailing Online service for a one-time mailing, will be able to do so. If you do not confirm, please explain.
- b. Please confirm that during the expanded (market) test, an individual customer, located within one (or more) of the three metropolitan areas, that seeks to use the Mailing Online service for a one-time mailing consisting of a quantity of one, will be able to do so. If you do not confirm, please explain.

OCA/USPS-T1-34. Please refer to your testimony at page 10, lines 2-5, where it states that Mailing Online customers “will be notified of addresses that cannot be matched with the Postal Service’s Address Management System database and are therefore being purged from the list.”

- a. Please confirm that during the operational test phase, the Postal Service did not offer the service feature described above to Mailing Online customers. If you do not confirm, please explain.
- b. Please confirm that during the expanded (market) test, the Postal Service plans to offer the service feature described above to Mailing Online customers. If you do not confirm, please explain.

OCA/USPS-T1-35. Please refer to your testimony at page 10, lines 2-5, where it states that Mailing Online customers “will be notified of addresses that cannot be matched with the Postal Service’s Address Management System database and are therefore being purged from the list.” Please explain how this service feature described above differs from the special service

- a. ZIP Coding of Mailing Lists; and,
- b. Correction of Mailing Lists.

OCA/USPS-T1-36. Please refer to your testimony at page 10, lines 2-5, where it states that Mailing Online customers “will be notified of addresses that cannot be matched with

the Postal Service's Address Management System database and are therefore being purged from the list."

- a. Please confirm that Mailing Online customers will be charged for the service feature described above. If you do not confirm, please explain.
- b. Please confirm that the Postal Service will return the corrected mailing list, or the names being purged from the list, to Mailing Online customers. If you do not confirm, please explain.

OCA/USPS-T1-37. Please refer to your testimony at page 10, lines 2-5.

- a. Please confirm that during the expanded (market) test, some Mailing Online customers may submit a document for the sole purpose of determining premailing fees, without completing the transaction and making payment for the Mailing Online service. If you do not confirm, please explain.
- b. Please confirm that the activities of some Mailing Online customers referred to in part (a) of this interrogatory will involve costs to the Postal Service for which it will receive no revenues. If you do not confirm, please explain.
- c. Please provide an estimate of the
 - i. number of Mailing Online customers described in part (a) of this interrogatory;
 - ii. number of occurrences for the activities described in part (a) of this interrogatory; and,
 - iii. costs associated with Mailing Online customers described in part (a) of this interrogatory.

- d. Please identify where the costs associated with Mailing Online customers described in part (a) of this interrogatory have been accounted for in the testimonies of witnesses Seckar and Stirewalt.

OCA/USPS-T1-38. Please refer to your testimony at pages 5 and 6, lines 19-20, and 1-4, respectively.

- a. Please confirm that potential Mailing Online customers will be able to access the Postal Service's Mailing Online World Wide Web site from anywhere in the
 - i. United States; and
 - ii. world.

If you do not confirm, please explain.

- b. Please explain the rationale for limiting the geographic scope, as opposed to the number of participants, during the expanded (market) test to the three metropolitan areas of New York, Boston and Philadelphia.


OCA/USPS-T1-39. Please refer to your testimony at pages 5 and 6, lines 19-20, and 1-4, respectively. Isn't it correct that potential customers outside the United States, e.g., in Europe, Australia, etc., with internet access, and the ability to make payment for Mailing Online via credit card, will be able to access the Postal Service's Post Office Online site and have their mailpieces originate in the United States, rather than in the nation in which the customer is located?

- a. If your answer is negative, please explain why the Postal Service would not wish to have such international business.

- b. If your answer is negative, please explain how the Postal Service would prevent such international usage.
- c. If your answer is positive, does such international usage violate any of the Postal Service's international postal agreements? Please explain. (If you are not able to answer this question, please redirect it to another witness with the ability to provide an answer or to the Postal Service, as an institution, for an answer).
- d. If your answer is positive, isn't it correct that usage by customers residing or doing business outside of the United States might have the effect of diverting postal revenues from the postal department in the nation in which the customer is located to the United States Postal Service? 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.


SHELLEY S. DREIFUSS
Attorney

Washington, D.C. 20268-0001
August 13, 1998