

ORIGINAL

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED

AUG 14 4 45 PM '98

U.S. DEPT. OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL

Mailing Online Service

Docket No. MC98-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS GARVEY TO INTERROGATORIES OF
OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T1-23-27)

The United States Postal Service hereby provides the response of witness
Garvey to the following interrogatories of Office of the Consumer Advocate:

OCA/USPS-T1-23-27, filed on August 4, 1998.

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

Respectfully submitted,

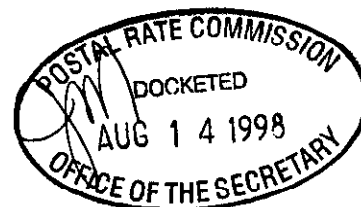
UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Kenneth N Hollies

475 L'Enfant Plaza West, S.W.
(202) 268-3083; Fax: -5402
Washington, D.C. 20260-1137
August 14, 1998



RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

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."

RESPONSE:

- a. (i-iii) Using the built-in file transfer capability of standard browser software, the Mailing Online Web server receives files selected for upload by users from content resident on their local drives or network. This is accomplished via a series of Hyper Text Markup Language (HTML) pages which the user views and interacts with while online using the World Wide Web. This process is enabled by the capabilities of the browser and therefore does not require additional software such as might be used in a point-to-point file transfer.

(iv) Unknown.
- b-c. Given the fact that the internet is just an access channel, and the World Wide Web is only a graphical interface to the internet, it is important for destinations on the internet to have effective "signposts". Unlike a PC

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

application which retains and reloads all user information and settings, an internet application effectively disappears each time the user signs off.

Although getting to and navigating the World Wide Web is as simple as "point and click", a user must first know how to get to a specific destination the first time, and then must remember how to return. The "point and click" hyper-linking characteristic has prompted an integration of World Wide Web functionality into many desktop applications such as word processors and even operating systems, e.g. Windows 98. Since Mailing Online access is only available via the World Wide Web, and since its functions compliment but do not replace a user's desktop applications, having "point and click" access to Mailing Online conveniently embedded in the applications themselves, and perhaps even in the desktop operating system as well, will certainly make the service more widely and easily available.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

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.

RESPONSE.

Answers to each of these questions are provided in the Attachment to Response to OCA/USPS-T1-24. The body of the Attachment contains five pages. One of these reports on operations test activity in Hartford, while the other four report on activity in Tampa. Please note that these latter four pages consist of a single table physically arrayed across all four pages, with columns representing each operations test customer and each row representing dates.

Attachment to Response to OCA/USPS-TI-24, Page 1

Tampa Market	Customer_ID								
Submit_Date	Data	192753531	336036201	338053810	338062533	338131223	338154416	338241207	797380048
3/19/98	Sum of Jobs	0	0	0	0	1	0	0	0
	Sum of Total_No_Pages	0	0	0	0	9	0	0	0
	Sum of Total_No_Env	0	0	0	0	9	0	0	0
3/20/98	Sum of Jobs	0	0	1	0	0	0	0	0
	Sum of Total_No_Pages	0	0	3320	0	0	0	0	0
	Sum of Total_No_Env	0	0	1660	0	0	0	0	0
3/24/98	Sum of Jobs	0	0	0	0	0	0	1	0
	Sum of Total_No_Pages	0	0	0	0	0	0	10	0
	Sum of Total_No_Env	0	0	0	0	0	0	10	0
3/27/98	Sum of Jobs	0	0	0	1	0	0	0	0
	Sum of Total_No_Pages	0	0	0	2	0	0	0	0
	Sum of Total_No_Env	0	0	0	2	0	0	0	0
4/6/98	Sum of Jobs	0	0	1	0	0	0	0	0
	Sum of Total_No_Pages	0	0	238	0	0	0	0	0
	Sum of Total_No_Env	0	0	119	0	0	0	0	0
4/10/98	Sum of Jobs	0	1	0	0	0	0	0	0
	Sum of Total_No_Pages	0	1070	0	0	0	0	0	0
	Sum of Total_No_Env	0	535	0	0	0	0	0	0
4/13/98	Sum of Jobs	0	0	0	0	0	0	1	0
	Sum of Total_No_Pages	0	0	0	0	0	0	3662	0
	Sum of Total_No_Env	0	0	0	0	0	0	1831	0
4/20/98	Sum of Jobs	0	0	1	0	0	1	0	1
	Sum of Total_No_Pages	0	0	2604	0	0	999	0	3800
	Sum of Total_No_Env	0	0	1302	0	0	999	0	3800
4/21/98	Sum of Jobs	0	1	0	0	0	0	0	0
	Sum of Total_No_Pages	0	358	0	0	0	0	0	0
	Sum of Total_No_Env	0	89	0	0	0	0	0	0
4/22/98	Sum of Jobs	0	1	0	0	0	0	0	0
	Sum of Total_No_Pages	0	1593	0	0	0	0	0	0
	Sum of Total_No_Env	0	531	0	0	0	0	0	0
4/29/98	Sum of Jobs	0	1	0	0	0	0	0	0
	Sum of Total_No_Pages	0	1527	0	0	0	0	0	0
	Sum of Total_No_Env	0	509	0	0	0	0	0	0
5/2/98	Sum of Jobs	0	1	0	0	0	0	0	0
	Sum of Total_No_Pages	0	282	0	0	0	0	0	0
	Sum of Total_No_Env	0	94	0	0	0	0	0	0
5/5/98	Sum of Jobs	0	0	0	1	0	0	0	0
	Sum of Total_No_Pages	0	0	0	9	0	0	0	0
	Sum of Total_No_Env	0	0	0	3	0	0	0	0
5/8/98	Sum of Jobs	0	0	0	1	0	0	0	0
	Sum of Total_No_Pages	0	0	0	93	0	0	0	0
	Sum of Total_No_Env	0	0	0	31	0	0	0	0
5/20/98	Sum of Jobs	0	4	0	0	0	0	0	0
	Sum of Total_No_Pages	0	6721	0	0	0	0	0	0
	Sum of Total_No_Env	0	1577	0	0	0	0	0	0
5/26/98	Sum of Jobs	0	1	0	2	0	0	0	0
	Sum of Total_No_Pages	0	2036	0	12	0	0	0	0
	Sum of Total_No_Env	0	508	0	6	0	0	0	0
5/29/98	Sum of Jobs	0	1	0	0	0	0	0	0
	Sum of Total_No_Pages	0	272	0	0	0	0	0	0
	Sum of Total_No_Env	0	68	0	0	0	0	0	0
6/1/98	Sum of Jobs	0	0	0	0	0	1	0	0
	Sum of Total_No_Pages	0	0	0	0	0	1272	0	0
	Sum of Total_No_Env	0	0	0	0	0	1272	0	0
06-Jun-1998	Sum of Jobs	0	1	0	0	0	0	0	0
	Sum of Total_No_Pages	0	54	0	0	0	0	0	0
	Sum of Total_No_Env	0	54	0	0	0	0	0	0
09-Jun-1998	Sum of Jobs	0	0	0	0	0	0	0	0
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0
	Sum of Total_No_Env	0	0	0	0	0	0	0	0
11-Jun-1998	Sum of Jobs	0	0	0	0	0	0	0	0
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0
	Sum of Total_No_Env	0	0	0	0	0	0	0	0
17-Jun-1998	Sum of Jobs	1	0	0	0	0	0	0	0
	Sum of Total_No_Pages	280	0	0	0	0	0	0	0
	Sum of Total_No_Env	280	0	0	0	0	0	0	0
26-Jun-1998	Sum of Jobs	0	0	0	0	0	0	0	0
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0

Attachment to Response to OCA/USPS-T1-24, Page 2

	Sum of Total_No_Env	0	0	0	0	0	0	0	0
27-Jun-1998	Sum of Jobs	0	0	0	0	0	0	0	0
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0
	Sum of Total_No_Env	0	0	0	0	0	0	0	0
01-Jul-1998	Sum of Jobs	0	0	0	0	0	0	0	0
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0
	Sum of Total_No_Env	0	0	0	0	0	0	0	0
02-Jul-1998	Sum of Jobs	0	0	0	0	0	0	0	0
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0
	Sum of Total_No_Env	0	0	0	0	0	0	0	0
07-Jul-1998	Sum of Jobs	0	0	0	0	0	0	0	0
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0
	Sum of Total_No_Env	0	0	0	0	0	0	0	0
08-Jul-1998	Sum of Jobs	0	0	0	0	0	0	0	0
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0
	Sum of Total_No_Env	0	0	0	0	0	0	0	0
09-Jul-1998	Sum of Jobs	0	0	0	0	0	0	0	0
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0
	Sum of Total_No_Env	0	0	0	0	0	0	0	0
14-Jul-1998	Sum of Jobs	0	0	0	0	0	0	0	0
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0
	Sum of Total_No_Env	0	0	0	0	0	0	0	0
21-Jul-1998	Sum of Jobs	0	1	0	0	0	0	0	0
	Sum of Total_No_Pages	0	58	0	0	0	0	0	0
	Sum of Total_No_Env	0	58	0	0	0	0	0	0
23-Jul-1998	Sum of Jobs	0	1	0	0	0	0	0	0
	Sum of Total_No_Pages	0	188	0	0	0	0	0	0
	Sum of Total_No_Env	0	47	0	0	0	0	0	0
25-Jul-1998	Sum of Jobs	0	0	1	0	0	0	0	0
	Sum of Total_No_Pages	0	0	3972	0	0	0	0	0
	Sum of Total_No_Env	0	0	1324	0	0	0	0	0
29-Jul-1998	Sum of Jobs	0	0	0	0	0	0	0	0
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0
	Sum of Total_No_Env	0	0	0	0	0	0	0	0
30-Jul-1998	Sum of Jobs	0	0	0	0	0	0	0	0
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0
	Sum of Total_No_Env	0	0	0	0	0	0	0	0
Total Sum of Jobs		1	14	4	5	1	2	2	1
Total Sum of Total_No_Pages		280	14157	10134	116	9	2271	3872	3800
Total Sum of Total_No_Env		280	4071	4405	42	9	2271	1841	3800
Transactions By Month									
March		0	0	1	1	1	0	1	0
April		0	4	2	0	0	1	1	1
May		0	7	0	4	0	0	0	0
June		1	1	0	0	0	1	0	0
July		0	2	1	0	0	0	0	0
Transactions/Mo		0.20	2.80	0.80	1.00	0.20	0.40	0.40	0.20

Attachment to Response to OCA/USPS-T1-24, Page 3

COUNTS

813006099	813007863	813008304	813002130	336053810	813008304	813007863	797380046	813004188	336193602	Grand Total	# Customers per day
0	0	0	0	0	0	0	0	0	0	1	1
0	0	0	0	0	0	0	0	0	0	9	
0	0	0	0	0	0	0	0	0	0	9	
0	0	0	0	0	0	0	0	0	0	1	1
0	0	0	0	0	0	0	0	0	0	3320	
0	0	0	0	0	0	0	0	0	0	1660	
0	0	0	0	0	0	0	0	0	0	1	1
0	0	0	0	0	0	0	0	0	0	10	
0	0	0	0	0	0	0	0	0	0	10	
0	0	0	0	0	0	0	0	0	0	1	1
0	0	0	0	0	0	0	0	0	0	2	
0	0	0	0	0	0	0	0	0	0	2	
0	0	0	0	0	0	0	0	0	0	1	1
0	0	0	0	0	0	0	0	0	0	238	
0	0	0	0	0	0	0	0	0	0	119	
0	0	0	0	0	0	0	0	0	0	1	1
0	0	0	0	0	0	0	0	0	0	1070	
0	0	0	0	0	0	0	0	0	0	535	
0	0	0	0	0	0	0	0	0	0	1	1
0	0	0	0	0	0	0	0	0	0	3662	
0	0	0	0	0	0	0	0	0	0	1631	
0	0	0	0	0	0	0	0	0	0	3	3
0	0	0	0	0	0	0	0	0	0	7203	
0	0	0	0	0	0	0	0	0	0	5901	
0	0	0	0	0	0	0	0	0	0	1	1
0	0	0	0	0	0	0	0	0	0	356	
0	0	0	0	0	0	0	0	0	0	89	
0	0	0	0	0	0	0	0	0	0	1	1
0	0	0	0	0	0	0	0	0	0	1593	
0	0	0	0	0	0	0	0	0	0	631	
0	0	0	0	0	0	0	0	0	0	1	1
0	0	0	0	0	0	0	0	0	0	1527	
0	0	0	0	0	0	0	0	0	0	509	
0	0	0	0	0	0	0	0	0	0	1	1
0	0	0	0	0	0	0	0	0	0	282	
0	0	0	0	0	0	0	0	0	0	94	
0	0	0	0	0	0	0	0	0	0	1	1
0	0	0	0	0	0	0	0	0	0	9	
0	0	0	0	0	0	0	0	0	0	3	
0	0	0	0	0	0	0	0	0	0	1	1
0	0	0	0	0	0	0	0	0	0	93	
0	0	0	0	0	0	0	0	0	0	31	
0	0	0	0	0	0	0	0	0	0	4	1
0	0	0	0	0	0	0	0	0	0	6721	
0	0	0	0	0	0	0	0	0	0	1577	
0	0	0	0	0	0	0	0	0	0	3	2
0	0	0	0	0	0	0	0	0	0	2048	
0	0	0	0	0	0	0	0	0	0	516	
0	0	0	0	0	0	0	0	0	0	1	1
0	0	0	0	0	0	0	0	0	0	272	
0	0	0	0	0	0	0	0	0	0	68	
0	0	0	0	0	0	0	0	0	0	1	1
0	0	0	0	0	0	0	0	0	0	1272	
0	0	0	0	0	0	0	0	0	0	1272	
0	0	2	0	0	0	0	0	0	0	3	2
0	0	-8	0	0	0	0	0	0	0	46	
0	0	-2	0	0	0	0	0	0	0	52	
0	3	0	0	0	0	0	0	0	0	3	1
0	14	0	0	0	0	0	0	0	0	14	
0	9	0	0	0	0	0	0	0	0	9	
1	1	1	0	0	0	0	0	0	0	3	3
188	2	-4	0	0	0	0	0	0	0	188	
188	2	-1	0	0	0	0	0	0	0	188	
2	1	1	0	0	0	0	0	0	0	6	4
244	6	20	0	0	0	0	0	0	0	550	
172	6	5	0	0	0	0	0	0	0	463	
0	0	0	1	0	0	0	0	0	0	1	1
0	0	0	9	0	0	0	0	0	0	9	

Attachment to Response to OCA/USPS-T1-24, Page 4

0	0	0	3	0	0	0	0	0	0	3	
0	0	0	0	1	0	0	0	0	0	1	1
0	0	0	0	2586	0	0	0	0	0	2586	
0	0	0	0	1293	0	0	0	0	0	1293	
0	0	0	1	0	0	0	0	0	0	1	1
0	0	0	937	0	0	0	0	0	0	937	
0	0	0	937	0	0	0	0	0	0	937	
0	0	0	0	0	1	0	0	0	0	1	1
0	0	0	0	0	4508	0	0	0	0	4508	
0	0	0	0	0	1142	0	0	0	0	1142	
0	0	0	0	0	0	3	1	0	0	4	2
0	0	0	0	0	0	11	5338	0	0	5347	
0	0	0	0	0	0	11	2688	0	0	2679	
0	0	0	0	0	0	0	1	1	0	2	2
0	0	0	0	0	0	0	3676	2178	0	5854	
0	0	0	0	0	0	0	1838	2178	0	4016	
0	0	0	0	0	0	0	0	1	0	1	1
0	0	0	0	0	0	0	0	2178	0	2178	
0	0	0	0	0	0	0	0	2178	0	2178	
0	0	0	1	0	0	0	0	0	0	1	1
0	0	4544	0	0	0	0	0	0	0	4544	
0	0	1138	0	0	0	0	0	0	0	1138	
0	0	0	0	0	0	0	0	0	0	1	1
0	0	0	0	0	0	0	0	0	0	58	
0	0	0	0	0	0	0	0	0	0	58	
1	0	0	0	0	0	0	0	0	0	2	2
1240	0	0	0	0	0	0	0	0	0	1428	
310	0	0	0	0	0	0	0	0	0	357	
0	0	0	0	0	0	0	0	0	0	1	1
0	0	0	0	0	0	0	0	0	0	3972	
0	0	0	0	0	0	0	0	0	0	1324	
0	0	0	0	0	0	0	0	0	2	2	1
0	0	0	0	0	0	0	0	0	9980	9980	
0	0	0	0	0	0	0	0	0	4990	4990	
0	0	0	0	0	1	0	0	0	0	1	1
0	0	0	0	0	4684	0	0	0	0	4684	
0	0	0	0	0	1166	0	0	0	0	1166	
4	5	5	2	1	2	3	2	2	2	58	18
1672	22	4552	948	2586	9232	11	9012	4356	9980	78608	
670	17	1138	940	1293	2308	11	4508	4356	4990	35748	
0	0	0	0	0	0	0	0	0	0		
0	0	0	0	0	0	0	0	0	0		
0	0	0	0	0	0	0	0	0	0		
3	5	4	1	1	0	0	0	0	0		
1	0	1	1	0	2	3	2	2	2		
0.80	1.00	1.00	0.40	0.20	0.40	0.60	0.40	0.40	0.40		

Hardford Market Subarea_Oct98	Customer_ID	8500029607	8500071115	8500078999	8500125003	8500180691	8500164433	8500169091	850011427	8500125959	Grand Total	COUNTS #Customers per day
5/3/98	850001431	0	0	0	0	0	0	0	0	0	130	1
	Sum of Jobs	0	0	0	0	0	0	0	0	0	130	
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0	0	65	
5/5/98		0	0	0	0	0	0	0	0	0	1	1
	Sum of Jobs	0	0	0	0	0	0	0	0	0	1	
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0	0	2	
5/7/98		0	0	0	0	0	0	0	0	0	2	1
	Sum of Jobs	0	0	0	0	0	0	0	0	0	1	
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0	0	27	
5/19/98		0	27	0	0	0	0	0	0	0	27	1
	Sum of Jobs	0	0	0	0	0	0	0	0	0	2	
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0	0	2487	
5/21/98		0	0	0	0	0	0	0	0	0	2487	1
	Sum of Jobs	0	0	0	0	0	0	0	0	0	2	
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0	0	28	
5/29/98		0	0	0	0	0	0	0	0	0	14	1
	Sum of Jobs	0	0	0	0	0	0	0	0	0	1	
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0	0	1304	
5/29/98		0	0	0	0	0	0	0	0	0	1304	1
	Sum of Jobs	0	0	0	0	0	0	0	0	0	2	
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0	0	316	
06-Jun-1998		0	0	0	0	0	0	0	0	0	158	2
	Sum of Jobs	0	0	0	0	0	0	0	0	0	0	
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0	0	442	
10-Jun-1998		0	0	0	0	0	0	0	0	0	442	1
	Sum of Jobs	0	0	0	0	0	0	0	0	0	1	
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0	0	998	
17-Jun-1998		0	0	0	0	0	0	0	0	0	998	1
	Sum of Jobs	0	0	0	0	0	0	0	0	0	0	
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0	0	30	
22-Jun-1998		0	0	0	0	0	0	0	0	0	15	1
	Sum of Jobs	0	0	0	0	0	0	0	0	0	0	
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0	0	6	
25-Jun-1998		0	0	0	0	0	0	0	0	0	3	1
	Sum of Jobs	0	0	0	0	0	0	0	0	0	0	
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0	0	4527	
07-Jul-1998		0	0	0	0	0	0	0	0	0	15039	1
	Sum of Jobs	0	0	0	0	0	0	0	0	0	0	
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0	0	272	
09-Jul-1998		0	0	0	0	0	0	0	0	0	272	1
	Sum of Jobs	0	0	0	0	0	0	0	0	0	1	
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0	0	744	
14-Jul-1998		0	0	0	0	0	0	0	0	0	744	1
	Sum of Jobs	0	0	0	0	0	0	0	0	0	0	
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0	0	568	
21-Jul-1998		0	0	0	0	0	0	0	0	0	568	2
	Sum of Jobs	0	0	0	0	0	0	0	0	0	0	
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0	0	33	
30-Jul-1998		0	0	0	0	0	0	0	0	0	33	1
	Sum of Jobs	0	0	0	0	0	0	0	0	0	1	
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0	0	6	
	Sum of Jobs	0	0	0	0	0	0	0	0	0	3	
	Sum of Total_No_Pages	0	0	0	0	0	0	0	0	0	24	10
Total Sum of Jobs		2	27	1	5	0	0	0	0	0	0	
Total Sum of Total_No_Pages		28	1532	2805	1704	45	12	4527	1018	33	11729	
Transactions By Month		14	1467	2647	1704	30	6	1509	1018	33	8453	
May		2	2	5	0	0	0	0	0	0	0	
June		0	1	0	4	1	1	0	0	0	0	
July		0	0	0	1	1	1	0	2	1	0	
Transactions/Mo		0.67	1.00	1.67	1.67	0.67	0.67	0.33	0.67	0.33	0.33	

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

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.

RESPONSE:

- a. Drop shipping refers here to the enclosure of prepared mailings within pre-labeled Express Mail pouches prior to acceptance at a local Business Mail Entry Unit. The pouches are sealed after local acceptance processing and dispatched via Express Mail transportation to another office for "open and distribute" handling, meaning that the pouches are opened at the destination facility and the enclosed mail is entered into the processing stream as appropriate for its class and makeup.
- b. I can only confirm that Witness Wilcox so testifies in USPS-T-7.
- c. I have no knowledge of the sort plans at the Dallas, Texas P&DC. Such knowledge is immaterial to the Mailing Online operations test.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

- d. For this purpose, it refers to any handling outside of the usual or any request beyond the ordinary course of business as defined by an entry unit's normal operating procedures.
- e. Transportation for the Express Mail drop shipments from Dallas to Tampa and Hartford are detailed on the attached Express Mail Service Leg forms, Attachments 1 & 2.

FROM: US POSTAL SERVICE U.S. POSTAL SERVICE EXPRESS MAIL SERVICE LEG				FAX NO.: 9723936664		08-14-98 10:12A P.03	
2a. ND PU []		3. 1st Ship 05/01/98		4. Cancel / /			
G/X G	City Code 200	Agmt. No. 494	Leg No. 089	Int'l	2b. Reship []	5. Chg Date 05/04/98	Items 7a
6. FROM: MANAGER OF MARKETING DALLAS DISTRICT 951 W BETHEL RD COPPELL TX 75099-9996					17. TO: MANAGER-DISTRIBUTION & OPERATIONS "OPEN & DISTRIBUTE" 141 WESTON ST HARTFORD CT 06101-9702		
Firm Representative Phone EXPEDITED SRV SPEC (214) 760-4640					Firm Representative Phone EXPEDITED SRV SPEC		
7a. Pickup between 1130-1230					18a. Delivery between		
7b. By: 75240					18b. By:		
8. Customer tender before: To: [] P.O. [] AMF Name: Zip + 4 Code :					19. Customer claim after: 0130 To: [X] P.O. [] AMF Name: HARTFORD CT Zip + 4 Code: 06101-9702		
9. Mailed	Mon X	Tue X	Wed X	Thu X	Fri X	Sat X	Sun X
Delivered	X	X	X	X	X	X	X
10. FREQUENCY CODE Mailing K7 Delivery K7 Service 22					20. Pickup chg waiver Del. chg waiver [] [X]		
11. Exception to established frequency					21. EMCA established at: WASHINGTON DC Phone: EMCA Chargeback Code:		
12. Service less than weekly					22. Express Mail Zone: 23. Agency Control No.: 411 Sub-Control No.: 02548		
13. USPS Notes PICK UP ADDRESS: XEROX DTC 4490 ALPHA RD DALLAS TX 75244-4505 XEROX WILL CALL SPRING VALLEY WHEN SATURDAY PICK UP IS NEEDED.					24. ROUTING INFORMATION DEPART ARRIVE Place Time Place Time NTMPC 1405 750VS372 DFW 142 DFW 1720 AA1890 BDL 2 SAME-DAY SERVICE		

OPTIONAL FORM 39 (7-95)

FAX TRANSMITTAL

3 of pages 2

From: [REDACTED]	
Dpt./Agency: [REDACTED]	
Phone #: [REDACTED]	
Fax: [REDACTED]	

FROM: US POSTAL SERVICE		FAX NO.: 9723936664		08-14-98 10:12A P.02			
U.S. POSTAL SERVICE		2a. ND PU		3. 1st Ship			
EXPRESS MAIL SERVICE LEG		[]		03/10/98			
4. Cancel				/ /			
G/X	City Code	Agmt. No.	Leg No.	Int'l	2b. Reship		
G	200	494	088		[]		
					5. Chg Date		
					05/04/98		
					Items		
					7a		
6. FROM:			17. TO:				
MANAGER OF MARKETING			MANAGER-DISTRIBUTION & OPERATIONS				
DALLAS DISTRICT			"OPEN & DISTRIBUTE"				
951 W BETHEL RD			5201 WEST SPRUCE ST				
CORPPELL TX 75099-9996			TAMPA FL 33630-9722				
Firm Representative			Firm Representative				
Phone			Phone				
EXPEDITED SRV SPEC (214) 760-4640			EXPEDITED SRV SPEC (202) 636-1401				
7a. Pickup between 1130-1230			18a. Delivery between -				
7b. By: 75240			18b. By:				
8. Customer tender before:			19. Customer claim after: 2359				
To: [] P.O. [] AMF			To: [X] P.O. [] AMF				
Name:			Name: TAMPA FL				
Zip + 4 Code :			Zip + 4 Code: 33630-9722				
9. Mailed	Mon	Tue	Wed	Thu	Fri	Sat	Sun
	X	X	X	X	X	X	
Delivered	X	X	X	X	X	X	
10. FREQUENCY CODE							
Mailing		Delivery		Service			
K7		K7		22			
11. Exception to established frequency							
12. Service less than weekly							
22. Express Mail Zone:							
23. Agency Control No.: 411							
Sub-Control No.: 02548							
13. USPS Notes				24. ROUTING INFORMATION			
PICK UP ADDRESS:				DEPART			
XEROX DTC				ARRIVE			
4490 ALPHA RD				Place			
DALLAS TX 75244-4503				Time			
XEROX WILL CALL SPRING VALLEY				Place			
WHEN SATURDAY PICKUP IS NEEDED.				Time			
14. SIC 7399		15. Mkt No.		SERVICE			
16. Account Rep: BUSINESS CTR							
25. Signature: DIANA FISHER							

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

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.

RESPONSE:

Two factors influenced this decision: (1) since the Postal Service is collecting the postage directly from Mailing Online customers, it will have funds in hand when the transaction is complete. It would not make sense, nor would it be cost effective, to transfer these postage funds to a third party only to receive them again when the mail is entered some 24 hours later. (2) Since the files are being split and routed based on ZIP Codes, and then batched according to print site destination, postage paid for one customer transaction will potentially represent multiple entry points. The consequent accounting would represent a formidable challenge if a centralized accounting system were not being used, and the only logical holder of such a centralized account is the Postal Service since all other parties are site specific vendors or customers.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

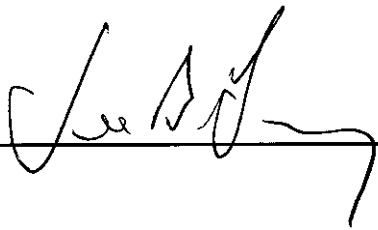
OCA/USPS-T1-27. Please refer to your response to OCA/USPS-T1-3(d).
Please provide a copy of the pages which will have prices entered upon them,
and any other pages that are changed, from USPS-LR-5/MC98-1 once
signatures are affixed.

RESPONSE:

The completed and signed contract, including prices, will be filed as a Library
Reference immediately upon award. Award is expected to be made within days.

DECLARATION

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



A handwritten signature, appearing to read "Lee Garvey", is written over a horizontal line.

Dated: 8/14/98

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 14, 1998