

ORIGINAL

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

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U.S. POSTAL SERVICE
OFFICE OF THE SECRETARY

Mailing Online Service

Docket No. MC98-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS STIREWALT TO INTERROGATORIES OF
OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T3-11-16)

The United States Postal Service hereby provides the response of witness
Stirewalt to the following interrogatories of Office of the Consumer Advocate:
OCA/USPS-T3-11-16, filed on August 4, 1998.

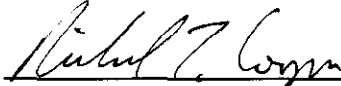
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

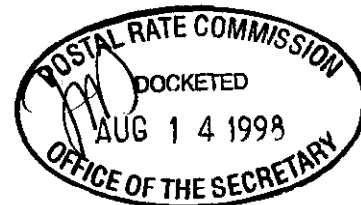
UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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August 14, 1998



Response Of Postal Service Witness Stirewalt
To OCA Interrogatory

OCA/USPS-T3-11. Please refer to USPS-LR-1/MC98-1, Attachment 1, pages 6 and 7. For the year 1999, please explain the difference between the figure 839964.69, "Average Bytes Per Incoming Customer Transmission," and the figure 30720, "Number of Bytes Per Mailing Piece Transaction."

RESPONSE

The figure "Average Bytes Per Incoming Customer Transmission " refers to the size in bytes of an electronic document and mailing list transmitted by a customer to the Mailing Online processing center. The figure "Number of Bytes Per Mailing Piece Transaction" refers to the size in bytes of one page of a electronic document in the Postscript format used for Mailing Online processing.

Response Of Postal Service Witness Stirewalt
To OCA Interrogatory

OCA/USPS-T3-12. Please refer to USPS-LR-1/MC98-1, Attachment 1, page 7. In the line, "Number of Mail Pieces Per Business Day," you assumed 312 business days per year, while witness Seckar assumed 302 business days per year. See USPS-T-2, Exhibit A, page 11. Please explain why there is a difference between the number of business days assumed by you and witness Seckar.

RESPONSE

I did not collaborate with Mr. Seckar in developing my estimates. My assumption of 312 business days is based on 6 days per week X 52 weeks in a year. I do not know how Mr. Seckar developed an estimate of 302 business days.

Response Of Postal Service Witness Stirewalt
To OCA Interrogatory

OCA/USPS-T3-13. Please refer to USPS-LR-1/MC98-1, Attachment 1, page 7. Please define "mail merge jobs" and "non mail merge jobs."

RESPONSE

Documents that require an address to be embedded must be processed differently than documents that do not have this requirement. The former are processed as a single electronic document copy, and forwarded along with their associated mailing lists to the print sites . This process is referred to in my Attachment 1 as a "non mail merge job". A "mail merge job" refers to merging of electronic documents with the addresses in the mailing list. The entire set of electronic documents is then sent to the print sites.

Response Of Postal Service Witness Stirewalt
To OCA Interrogatory

OCA/USPS-T3-14. Please refer to USPS-LR-1/MC98-1, Attachment 1, page 11, concerning the Technical Help Desk Resource Years.

- a. In the line "Total First Time Call Hours," please confirm that the factor 1.5 "to account for customer turn over" was obtained during the Mailing Online operational test period from
 - i. sampling data;
 - ii. time-series data, or;
 - iii. personal observation.If you do not confirm, please explain.
- b. In the line "Total First Time Call Hours," please confirm that the 0.5 hour "estimate for initial call" was estimated from experience during the Mailing Online operational test period from
 - i. sampling data;
 - ii. time-series data, or;
 - iii. personal observation.If you do not confirm, please explain.
- c. Please confirm that an increase in the 0.5 hour "estimate for initial call" would increase the estimated fixed costs to the Postal Service for Mailing Online service. If you do not confirm, please explain.
- d. Please identify where the figures in the line "Total First Time Call Hours" are used in Attachment 2: Detailed Cost Estimates of USPS-LR-1/MC98-1.

RESPONSE

- a. I assumed a 1.5 customer roll over factor because I felt it was reasonable to assume that some current customers may discontinue using Mailing Online and, conversely, that new customers should be expected to begin using Mailing Online. The 1.5 roll over factor did not come from the operational test. The only information I have from the operational test that has any bearing on Technical Help Desk Resource Years is anecdotal; new customers require one half hour with a Help Desk agent the first time they contact the Help Desk to review the functionality of Mailing Online.
- b. The 0.5 hour "estimate for initial call" is based on discussions with Help Desk agents after the first few weeks of the operational test.

Response Of Postal Service Witness Stirewalt
To OCA Interrogatory

- c. Confirmed. However, I strongly believe that the half-hour figure is already very conservative, so if it is an inaccurate estimate, it errs only on the high side.

- d. They are not used directly. Please refer to the Cost Component Sources/Derivations Worksheet included in my response to interrogatories OCA/USPS-T3-1-4 for a description of how Attachment 1 figures correspond to component unit costs and number of units shown in Attachment 2.

Response Of Postal Service Witness Stirewalt
To OCA Interrogatory

OCA/USPS-T3-15. Please refer to USPS-LR-1/MC98-1, Attachment 1, page 11, concerning the Technical Help Desk Resource Years.

- a. In the line "Total On-going calls hours," please define "on-going calls."
- b. In the line "Total On-going calls hours," please confirm that the 0.1 hour "estimate for on-going calls" was estimated from experience during the Mailing Online operational test period from
 - i. sampling data;
 - ii. time-series data, or;
 - iii. personal observation.If you do not confirm, please explain.
- c. In the line "Total On-going calls hours," please confirm that the estimate of "3 calls average per year" was obtained during the Mailing Online operational test period from
 - i. sampling data;
 - ii. time-series data;
 - iii. personal observation, or;
 - iv. marketing survey.If you do not confirm, please explain.
- d. Please confirm that an increase in the 0.1 hour "estimate for on-going calls" would increase the estimated fixed costs to the Postal Service for Mailing Online service. If you do not confirm, please explain.
- e. Please identify where the figures in the line "Total On-going call hours" are used in Attachment 2: Detailed Cost Estimates of USPS-LR-1/MC98-1.

RESPONSE

- a. I refer to the number of calls over any given period of time, excluding the initial call for any given customer, as "on-going".
- b. I assumed 0.1 hour for each "on-going" call based solely on professional experience and not based on any information made available to me regarding the Mailing Online operations test.

Response Of Postal Service Witness Stirewalt
To OCA Interrogatory

c. I assumed "3 calls average per year" based solely on professional experience and not based on any information made available to me regarding the Mailing Online operations test.

d. Confirmed.

e. Please refer to the Cost Component Sources/Derivations Worksheet included in my response to OCA interrogatories 1-4 for a description of how Attachment 1 figures correspond to component unit costs and number of units shown in Attachment 2.

Response Of Postal Service Witness Stirewalt
To OCA Interrogatory

OCA/USPS-T3-16. Please refer to USPS-LR-1/MC98-1, Attachment 1, page 11, concerning the Technical Help Desk Resource Years. In the line "Percentage of customer calls requiring technical help," it states that "Experience during the pilot indicates that this percentage is low, but 50% is assumed for capacity planning."

- a. Please provide the actual percentage of customer calls requiring technical help during the "pilot."
- b. Please provide the rationale for assuming only 50 percent of customer calls would require technical help.
- c. Please confirm that the "Percentage of customer calls requiring technical help" is used to estimate the fixed costs of the Mailing Online service. If you do not confirm, please explain.
- d. Please confirm that a percentage greater than 50 percent of customer calls requiring technical help would increase the estimated fixed costs to the Postal Service for Mailing Online service. If you do not confirm, please explain.

RESPONSE

- a. The breakdown of customer calls during the operations test for the period

March 9, 1998 to August 13, 1998 is as follows:

Call Type	Item Affected	Problem	Question	Request	Comment	Change/ Enhancem ent	Total
Payment Adjustment	Credit-PO Mailing	5	4	17			26
Software	Access	2					2
Software	Adobe	4					4
Software	MS Excel	1	1				2
Software	MS Word	1	5				6
Software	Pagemaker		2				2
Software	Quark Xpress	1	1				2
Software	Tab Delimited	2	1				3
Software	WordPerfect		1				1
Job Status	Current	13	8	1	2		24
Job Status	Other	3	4			1	8
Job Ticket	Job Quote	6	4		1		11
Job Ticket	Print Options	4	6		1	1	12
Job Ticket	PDF View	14	1				15
Other	Other	14	9	3	8	5	39
Service Failure	Not to Order	9		1	2		12

Response Of Postal Service Witness Stirewalt
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Service Failure	Late Delivery	5			1		6
Service Failure	Orphaned Job	5			2	1	8
Service Failure	Print Quality	2	1		3		6
Upload	Document	33	14		3		50
Upload	Mailing List	28	10	2	3		43
Upload	Upload Failure	64	3		1		68
	Totals	216	75	24	27	8	350

If "software", and "upload" call types are categorized as technical assistance then 183 or 52% of a total of 350 calls would fall into the technical assistance category.

b. In my professional opinion, less than 50% of calls should require technical assistance. I therefore felt it was reasonable to assume 50% for estimating purposes.

c. Confirmed.

d. Confirmed.

DECLARATION

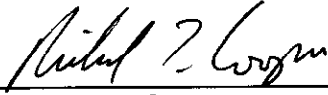
I, Daniel Stirewalt, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.



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.



Richard T. Cooper

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August 14, 1998