ORIGINAL

BEFORE THE
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-T1-45-46)
(October 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
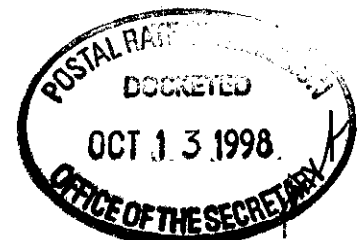
incorporated by reference.

Respectfully submitted,

Gail Willette
Acting Director
Office of the Consumer Advocate

Emmett Rand Costich
Acting Assistant Director

OCA/USPS-T1-45.   Please refer to Tr. 2/182 and Tr. 4/842. At page 182 you state,

"The system software defines batches based upon page count, paper size, bindery

options, spot color options and proofing options. Also, *non-merge jobs* are defined as

separate batches, as are fax-back and mail-back proofing requests." At page 842 you

calculate the number of possible job type batches by taking account of paper size, plex

options, bindery options, and color options.

a.   Has the computer code you provided at page 182 changed? If so, please

        provide a copy of the current code.

b.   Is each individual non-merge job treated as a separate job type batch? If so,

        why and how is this accomplished? If not, please describe how these jobs are

        batched and state whether these jobs are batched with mail-merge jobs.

c.   Is each individual fax-back job treated as a separate job type batch? If so, why

        and how is this accomplished? If not, please describe how these jobs are

        batched and state whether these jobs are batched with mail-merge jobs.

d.   Is each individual mail-back job treated as a separate job type batch? If so, why

        and how is this accomplished? If not, please describe how these jobs are

        batched and state whether these jobs are batched with mail-merge jobs.

e.   Please confirm that there are 48 possible page-count options. If you do not

        confirm, please state how many page-count options there are.

f.   Please confirm that for mail-merge jobs there are 42 X 48 = 2016 possible page-

        count/job-type batches. If you do not confirm, please state the correct number of

        possible mail-merge batches and show its derivation.

g.   Please confirm that the number of possible non-merge batches is unknowable,

        since each such job is treated as a separate batch. If you do not confirm, please

        state the correct number of possible non-merge batches and show its derivation.

h.   Please confirm that the number of possible fax-back batches is unknowable,

        since each such job is treated as a separate batch. If you do not confirm, please

        state the correct number of possible fax-back batches and show its derivation.

i.   Please confirm that the number of possible mail-back batches is unknowable,

        since each such job is treated as a separate batch. If you do not confirm, please

        state the correct number of possible mail-back batches and show its derivation.

OCA/USPS-T1-46.   Please refer to page 2 of witness Plunkett's response to

MASA/USPS-T5-11. Witness Plunkett states "that printers will, on average process

103,145 pieces per day . . . ." *See also* PRC Op. MC98-1, October 7, 1998, at 28: "The

Postal Service argues that when Mailing Online is fully deployed in its third year of

operation, there should be more than 100,000 pieces of Mailing Online submitted to

each print site per day."

a.   Please confirm that there is variation around the average of 103,145 pieces per

        print site per day—that is, on some days some print sites will receive fewer than

        103,145 pieces and some will receive more. If you do not confirm, please

        explain.

b.   Please provide an estimate of the standard deviation of the estimate 103,145

        pieces per print site per day. If you cannot provide the requested estimate,

please provide an estimate of the maximum and minimum pieces per print site per day for 2001.

c.   Please confirm that, prior to presorting, the 103,145 pieces received at a given print site must be spread over more than 2000 possible batch types. If you do not confirm, please explain.

d.   Please confirm that, if all possible batch types are equally likely to occur, the average size of a batch available for presorting would be approximately 50 pieces in 2001. If you do not confirm, please provide the correct average batch size and show its derivation.

e.   Please confirm that even for 2003, if all possible batch types are equally likely to occur, the average size of a batch available for presorting would be less than 100 pieces. If you do not confirm, please provide the correct average batch size and show its derivation.

f.   For each year 1999-2003, please provide an estimate of the distribution of presort batch sizes by subclass.

g.   For each year 1999-2003, please provide an estimate of the volume of Mailing Online pieces that will qualify for each possible presort level. In other words, provide a realistic estimate of the depth of sort actually achievable and explain the basis for the estimate.

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.

Emmett Rand Costich

Emmett Rand Costich
Attorney

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