

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

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POSTAL RATE COMMISSION  
OFFICE OF THE CONSUMER ADVOCATE

Mailing Online Service

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Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: LEE GARVEY  
(OCA/USPS-T1-53-55)  
(November 2, 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-T1-53. Please provide an updated response to interrogatory OCA/USPS-T1-10, parts d.-f.

OCA/USPS-T1-54. Please provide an updated response to interrogatory OCA/USPS-T1-24.

OCA/USPS-T1-55. Please refer to your response to interrogatory OCA/USPS-T1-19. In parts b.-d. of that interrogatory, you were asked to provide data on merging, batching, and presorting of Mailing Online pieces. In parts e.-i. of that interrogatory, you were asked for "downflow densities" for MOL pieces. In part j. of that interrogatory, you were asked whether the Postal Service would collect data responsive to that interrogatory during the experiment.


- a. In your response to part j. you stated, "Since the proposed Mailing Online fees are based solely upon pre-mail costs, and Mailing Online pieces are processed in conformity with existing procedures and capabilities, there is no need to study these issues." Please confirm that the data requested could be used to determine the most appropriate presort and entry discounts to be offered with Mailing Online. If you do not confirm, please explain.
- b. In its MC98-1 Recommended Decision on the market test, the Commission stated, "An important factual finding *necessary* to determine whether the Postal Service's proposed Mailing Online mailstream prices for the market test are reasonable is whether Mailing Online volumes will be sufficient in the long run (after batching), to bring essentially all Mailing Online mailings above the current

volume thresholds for automation discounts . . . ." PRC Op. MC98-1, October 7, 1998, at 27.

- i. Please explain how the Commission can make a similar finding for the experiment if "there is no need to study these issues."
- ii. Please identify the data that the Postal Service will be providing during the market test that will allow the Commission to make findings on (a) the appropriate level of automation discount for Mailing Online pieces during the experiment and (b) the need for a waiver of minimum volume requirements.

#### 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  
Attorney

Washington, D.C. 20268-0001  
November 2, 1998