

ORIGINAL

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

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OFFICE OF THE SECRETARY

Mailing Online Service)

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS: DANIEL STIREWALT
(OCA/USPS-T3-84)
November 6, 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 an interrogatory and request 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.

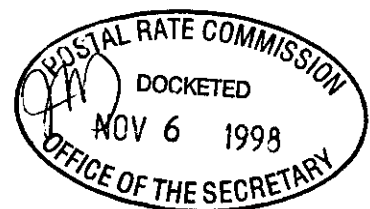
Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Shelley S. Dreifuss

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Attorney



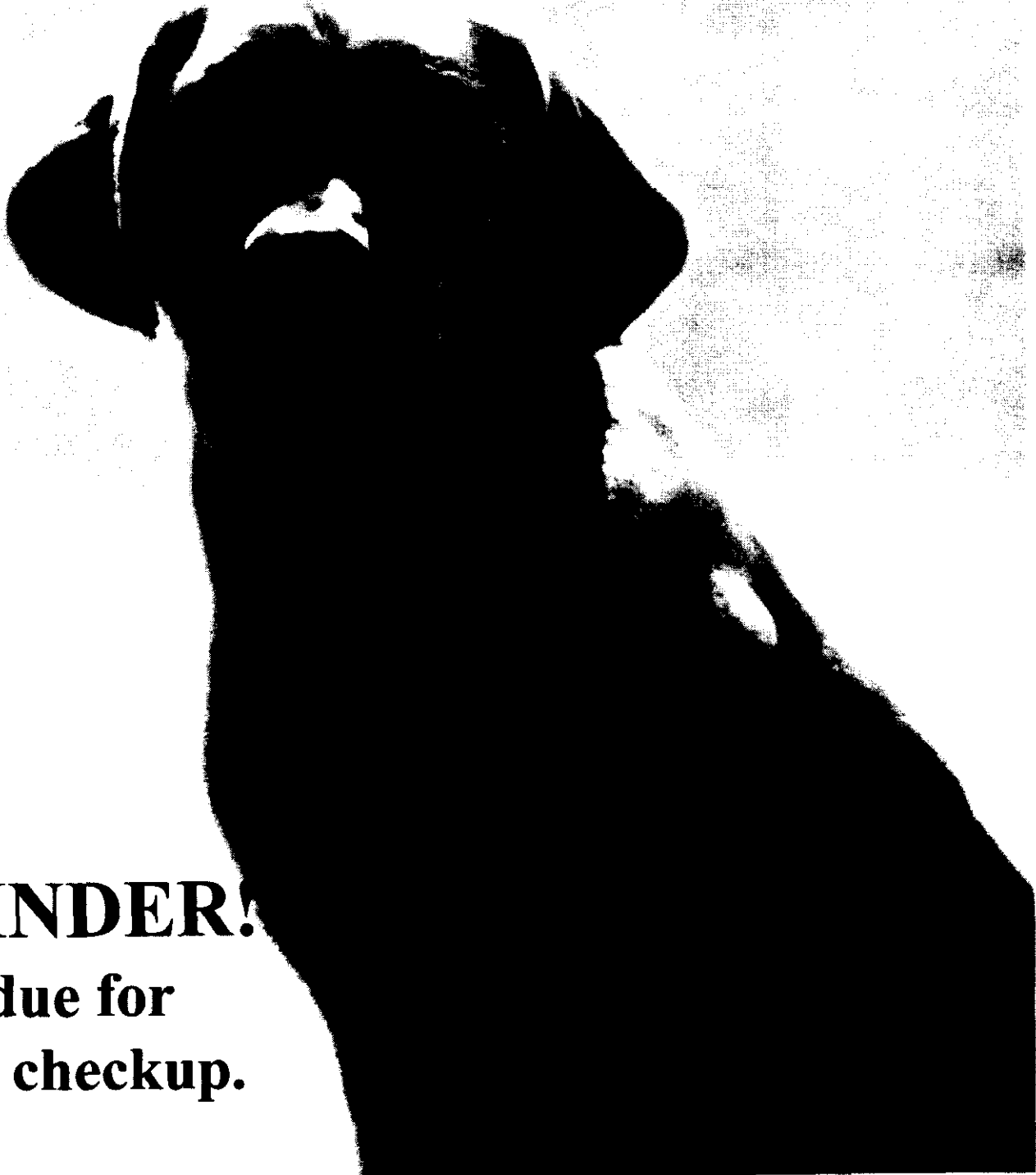
OCA/USPS-T3-84. In response to interrogatory OCA/USPS-T3-68.a., you state that the Mailing Online (MOL) software does not accept files in PDF format. As a consequence of that response, OCA has created a simulated flier in Microsoft Word that is very similar to the flier printed from the PDF file discussed in OCA/USPS-T3-68. OCA has filed a second library reference, OCA-LR-2, containing a 731 KB Word file that was used to print the Attachment to this set of interrogatories.

- a. Please review the document properties of the file contained in OCA-LR-2, entitled "WORDflier." Please confirm that this type of file would be acceptable for MOL (or redirect this interrogatory to a witness who is able to confirm or deny).
- b. Please review the number of bytes required to create the image and text of the simulated flier. Isn't it correct that this file is approximately 731 kilobytes (KB) in size?
- c. If you are not able to confirm that the file is acceptable for MOL, then explain why it is not acceptable (or redirect this question to a witness who is able to provide the explanation).
- d. In your response to part g. of OCA interrogatory OCA/USPS-T3-68, you stress that "a significant number, even a majority, [of jobs] would be submitted in the format of the most popular word processing software, Microsoft Word." Isn't it correct that the format used to generate the simulated flier is Microsoft Word? (If you do not answer affirmatively, provide an explanation.)
- e. At the end of your response to part g. of OCA interrogatory OCA/USPS-T3-68, you state that, "most, although not all of the content of Mailing Online

documents, would be in text.” What is the basis of that statement? Furnish all source documents supporting the stated assumption.

- f. Isn't it correct that the simulated flier created as a Microsoft Word document is approximately 145 times larger than the typical file size you assumed—5.02KB; i.e., $731/5.02 = 145.6$? (If you do not answer affirmatively, provide an explanation.)
- g. Isn't it correct that the Postal Service projects that approximately 69 percent of MOL jobs will be Standard A? (Refer to USPS-T-2, Exhibit A, Table 4, page 8, line 9). (If you do not answer affirmatively, provide an explanation.)
- h. Isn't it reasonable to assume that the majority of Standard A volume will be advertising material? (If you do not answer affirmatively, provide an explanation.)
- i. Isn't it also reasonable to assume that a majority of advertising material will make extensive use of graphics since graphics give an advertising piece greater visual impact? (If you do not answer affirmatively, provide an explanation.)

Dr. John Doe's Veterinary Services

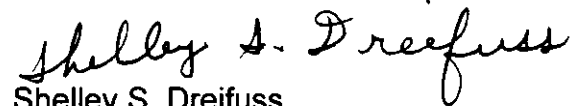


REMINDER!

**Fido is due for
his next checkup.**

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

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