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

RECEIVED
NOV 6 4 46 PM 158

MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE REDIRECTED FROM WITNESS STIREWALT (OCA/USPS-T3-76, 78, 81-83)

The United States Postal Service hereby provides the responses of witness Garvey to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T3-76, 78, 81-83, filed on October 27, 1998, and redirected from witness Stirewalt.

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. Washington, D.C. 20260–1137 (202) 268–3083; Fax –5402 November 6, 1998



OCA/USPS-T3-76. Please refer to your response to OCA/USPS-T3-63.

- a. Please confirm that it is the staff of the PostOffice Online Help Desk that makes an inquiry or problem report to the Technical Help Desk. If you do not confirm, please explain.
- b. Please confirm that it is the staff of the PostOffice Online Help Desk that makes an inquiry or problem report to the Technical Help Desk as a result of customer calls to the PostOffice Online Help Desk. If you do not confirm, please explain.
- c. Please confirm that the staff members of the PostOffice Online Help Desk acts as an intermediary between the Mailing Online Customer and the Technical Help Desk. If you do not confirm, please explain.
- d. Please confirm that the staff of the PostOffice Online Help Desk are "generalists" in that they are not experts in the technical aspects of the operation of Mailing Online. If you do not confirm, please explain and describe the level of expertise of the staff of the PostOffice Online Help Desk with respect to Mailing Online.
- e. Please confirm that under no circumstances are Mailing Online customers able to speak to Technical Help Desk personnel. If you do not confirm, please explain under what circumstances or conditions Mailing Online customers with technical questions can speak to Technical Help Desk personnel.
- f. Please confirm that the role of the staff of the PostOffice Online Help Desk as intermediaries increases the chances for misunderstanding, thereby increasing the amount of time to respond to customer calls requiring the assistance of the Technical Help Desk. If you do not confirm, please explain.

RESPONSE:

- a. Confirmed.
- b. Confirmed.
- c. Confirmed.
- d. Confirmed that the Help Desk staff are not required to be experts in the technical aspects of the operation of Mailing Online. They are required to be experts in customer relations and technically oriented problem resolution handling. The Help Desk staff is very conversant in both the

technical aspects of PostOffice Online end user issues and the diagnoses of symptomatic operational problems. They understand and are able to clearly communicate the functions of the Mailing Online and Shipping Online applications and describe the user actions necessary to accomplish successful use of them in clear, non-technical language. Yet they also possess knowledge of the technical operations of PostOffice Online sufficient to elicit non-technical observations and complaints by customers and convey them effectively to more technically oriented staff in an operations help function.

- e. Confirmed that under most circumstances customers will not speak with Technical Help Desk personnel. If a customer were ever to speak with the Technical Help Desk, it would likely be through the POL Help Desk. However, to my knowledge no criteria for such an exchange have been established.
- f. Not confirmed. It is my opinion that having the staff of the PostOffice

 Online Help Desk as intermediaries could effect an improvement in

 customer understanding and result in increased customer satisfaction.

OCA/USPS-T3-78. Please refer to your response to OCA/USPS-T3-68(a).

- Please provide a date at which time Mailing Online software will accept customer files in PDF format.
- b. Please explain the reasons the current Mailing Online software does not accept files in PDF format.

RESPONSE:

- a. The inclusion of PDF as an acceptable input file format is planned for the next major release of Mailing Online software. A precise date for the implementation of that release is unknown at this time, but it is likely to be mid-1999.
- b. See my response to OCA/USPS-T3-82.

OCA/USPS-T3-81. Please refer to your response to OCA/USPS-T3-72(c).

- Please identify the applications currently supported by the Mailing Online software.
- b. Please identify the applications in part (a) of this interrogatory that permit the creation of files in a PDF format.
- c. Please identify the applications in part (a) of this interrogatory that permit Mailing Online customers to create files in a Postscript format.
- d. Please confirm that Mailing Online customers can submit files in Postscript format. If you do not confirm, please explain.

RESPONSE:

- a. See MC98-1, USPS T-1, page 3, footnote 3 for applications currently supported.
- b. Off the shelf, only PageMaker™ currently provides for the creation of a
 PDF file. However, used in conjunction with Adobe Acrobat software, all
 of the other applications are capable of producing PDF output.
- c. All of the applications currently supported permit creation of Postscript output.
- d. Not confirmed. Currently, document and list files are accepted from customers in native word processing or page layout application format only. The system as originally specified - and as currently configured was simply not required to accept print file format as an input. Also, as I understand it, there would be formidable technical constraints to accepting Postscript as in input format.

OCA/USPS-T3-82. Please refer to your response to OCA/USPS-T3-72(c). In that response, you state, "The San Mateo processing center forwards all print jobs to the print site in PDF format." If San Mateo is able to process print jobs in PDF format for transmittal to the print sites, please explain why the San Mateo processing center is unable to accept Mailing Online customer files in PDF format.

RESPONSE:

The system as originally specified - and as currently configured - was simply not required to accept PDF format as an input. This will be a future enhancement. See my testimony, MC98-1, USPS T-1, page 3, footnote 3.

OCA/USPS-T3-83. Please refer to your response to OCA/USPS-T3-72(b). In that response, you did not confirm that "the San Mateo processing center processes files received from customers in PDF format." Please identify the format used by the San Mateo processing center to process files.

RESPONSE:

Currently, document and list files are received from customers in native word processing or page layout application format only. The system processes those files and creates PDF files as output.

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.

_ Lu Mary

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 November 6, 1998