BEFORE THE TALL RATE COMMISSIO

POSTAL RATE COMMISSION WASHINGTON, D.C. 20268–0001

Nov 6 4 46 PM 133

MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS STIREWALT TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS-T3-75, 79, AND 80)

The United States Postal Service hereby provides the responses of witness Stirewalt to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T3—75, 79, and 80, filed on October 27, 1998. A motion for extension of time to respond to interrogatory OCA/USPS-T3-77 is being filed separately today. Interrogatories OCA/USPS-T3—76, 78, and 81–83 were redirected to witness Garvey.

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

David H. Rubin

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2986; Fax –5402 November 6, 1998



RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS STIREWALT TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T3-75. Please refer to your response to OCA/USPS-T3-61. Please confirm that the 1800 workhours per "resource year" represent the *equivalent* of one Technical Help Desk personnel. If you do not confirm, please explain.

RESPONSE

Confirmed, although the 1800 workhours would in fact be spread among many personnel.

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OCA/USPS-T3-79. Please refer to your response to OCA/USPS-T3-71. Since you did not assume that files contain only plain text, please identify, and provide the number of bytes associated with, files other than plain text files.

RESPONSE

Although I did not assume that all Mailing Online files submitted by customers contain plain text only, I did not calculate or otherwise quantify a number of bytes associated with graphics that may be embedded in plain text files.

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OCA/USPS-T3-80. In your response to OCA/USPS-T3-35(e), you state, "The current Mailing Online system transmits all jobs to the print site in Postscript format." Please reconcile the statement quoted above with your response to OCA/USPS-T3-72(c), which states, "The San Mateo processing center forwards all print jobs to the print site in PDF format."

RESPONSE

My response to OCA/USPS-T3-72(c) resulted from discussion with the Mailing Online developer who at that time told me that the current Mailing Online forwards all print jobs to the print site in PDF format. My prior knowledge of the format of files forwarded to the print site was based on information available at an earlier period of time, and I reported this knowledge in my response to OCA/USPS-T3-35(e). My response to OCA/USPS-T3-72(c) supersedes my response to OCA/USPS-T3-35(e) with respect to the format of print jobs forwarded from the San Mateo processing center to the print site. All print jobs forwarded to the print site are in PDF format. A revised response to OCA/USPS-T3-35 is being filed separately today.

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.

Land Storium

Dated: NOVEMBER 6, 1998

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.

David H. Rubin

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