

ORIGINAL

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

RECEIVED

Nov 10 3 07 PM '98

OFFICE OF THE
SECRETARY
Docket No. MC98-1

Mailing Online Service)

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: MICHAEL K. PLUNKETT
(OCA/USPS-T5-47-50)
(November 10, 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.

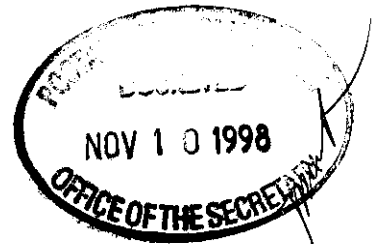
Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Emmett Rand Costich

Emmett Rand Costich
Acting Assistant Director



OCA/USPS-T5-47. Please refer to your response to NOI No. 1, Issue 1, at page 6,

where it states:

Consequently, the Postal Service has chosen relatively modest discounts which assume that a small level of batching and sortation depth will be achieved. In fact, we expect that in most instances, the mail may be presorted more finely and dropshipped more deeply into the system than is necessary to qualify for the proposed discounts.

- a. Please provide the actual level of batching and actual depth of sort for Mailing Online volumes during the operations test.
- b. Please provide the actual level of batching and actual depth of sort for Mailing Online volumes to date during the market test.

OCA/USPS-T5-48. Please refer to your response to NOI No. 1, Issue 1, at page 6, the relevant portion of which is quoted in OCA/USPS-T5-47. Please confirm that the data necessary to calculate the actual depth of sort

- a. for First-Class mail volume is the level of presort (e.g., none, basic, 3-digit, etc.) by job type, by page count, by print site, respectively. If you do not confirm, please explain, and identify all the types of data necessary to calculate the actual depth of sort.
- b. for Standard A mail volume, for pieces weighing 3.2985 ounces or less, is the level of presort by job type, by page count, by print site for regular and enhanced carrier route. If you do not confirm, please explain, and identify all the types of data necessary to calculate the actual depth of sort.

- c. for Standard A mail volume, for pieces weighing more than 3.2985 ounces, is the level of presort by job type, by page count, by print site for regular pieces and enhanced carrier route pieces. If you do not confirm, please explain, and identify all the types of data necessary to calculate the actual depth of sort.

OCA/USPS-T5-49. In his responses to OCA/USPS-T1-47c.-d. and OCA/USPS-T3-78a., witness Garvey seems to indicate that the information needed to calculate an actual average qualifying discount for MOL will not be available until "mid-1999." Is this your understanding? If not, when will depth of sort data by batch type (i.e., volumes by batch type by presort level) be available?

OCA/USPS-T5-50. Please refer to your response to interrogatory OCA/USPS-T5-37 and to witness Garvey's response to interrogatory MASA/USPS-T1-20b. In your response you suggest that average MOL charges for pre-mailing fees are likely to be lower than such charges under the sole existing printer contract because the current printer is in a "high cost area." Witness Garvey indicates that the next three contracts will be "in the Chicago, Los Angeles and New York areas."

- a. Do you believe that Chicago, Los Angeles, and New York are lower cost areas than the Boston area? If so what is the basis for your belief?
- b. Please identify all potential locations for print sites that you would consider lower cost areas than the Boston area. Please explain why these locations should be expected to have lower printing costs.

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 10, 1998