

ORIGINAL

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

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MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS STIREWALT TO INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T3-84)

The United States Postal Service hereby provides the response of witness Stirewalt to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T3-84, filed on November 6, 1998.

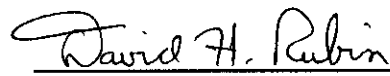
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

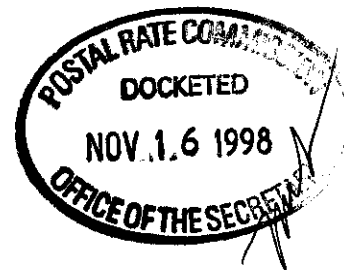
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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November 16, 1998



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TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

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.)

RESPONSE:

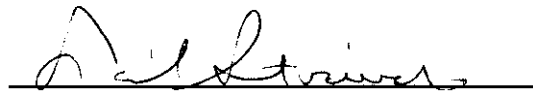
- a. Confirmed that the file WORDflier would be acceptable to Mailing Online.
- b. Correct.
- c. Not applicable.
- d. WORDflier is a Microsoft Word document containing an embedded graphic created, I believe, by another software product.

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- e. The statement made in the context of the response and my testimony in general is a restatement of my assumption when I originally developed my testimony. Since that time, I have not seen any data that demonstrate that this assumption is incorrect, i.e. that a majority of Mailing Online documents would not be in text.
- f. Correct.
- g. Correct.
- h. No. It is my understanding that USPS-LR-2/MC98-1, Table 5, projects that only 11 percent of Mailing Online pieces would be advertising mail.
- i. I have no basis to assume that any definite portion of an electronic Mailing Online document will be composed of graphics.

DECLARATION

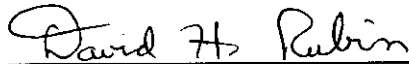
I, Daniel Stirewalt, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in cursive script, appearing to read "Daniel Stirewalt", is written over a horizontal line.

Dated: 11/16/98

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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