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

MAILING ONLINE SERVICE

Docket No. MC98–1

MOTION FOR LATE ACCEPTANCE OF AND
RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS GARVEY TO INTERROGATORY OCA/USPS–T1–57(i)
AND REVISION TO OCA/USPS–T1–57(g)

The United States Postal Service hereby provides the response of witness

Garvey to interrogatory OCA/USPS–T1–57(i) and moves that it be accepted two

business days out of time. As we indicated on November 13, the original due date,

the response to that part of the interrogatory, which sought a report from the system

developer, was not available at that time. It has now been obtained and is being filed
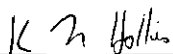
herewith.

Also provided is a slight revision to part (g) to correct a typographical error. A

revised page, including both changes, is provided.

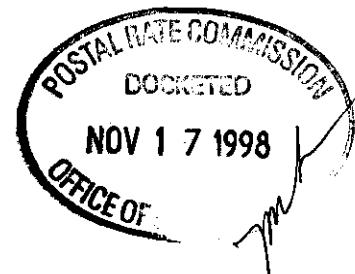Respectfully submitted,

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) 268–2999; Fax –5402
November 17, 1998

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

f.   Confirmed. Currently all batches are closed each day at 2:00 P.M. Eastern time.

g.   Yes. According to the system developer they can.

h.   Yes. The system currently retains information regarding presort, address files

        and document data as it pertains to specific batches.

i.   See Attachment to response to OCA/USPS-T1-57(i).

The current system configuration keeps track of the following:
1. The users addresses by batch; and
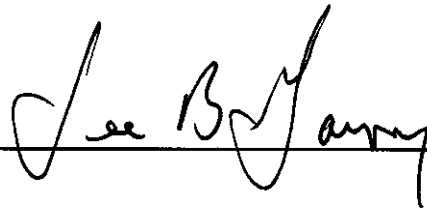2. The presort level reached by all addresses in a batch

The system could determine for each batch site where a user's mail was destined and the number of pieces that qualify for automated rates. This approach is fraught with at least three major shortcomings:

1. The need to automate refunds based on automated rates;
2. The system resources required to determine these discounts; and
3. The difficulty encountered with jobs moving from batch site to batch site as system saturation levels are reached, or when the batch site is unable to perform the work.

The procedure referenced is possible, however, the accounting processes implied would have a major impact on the system design; i.e., development of accounting processes not currently included in the system. In addition, this procedure would require a major investment in storage and retrieval of multiple refund records (for each generated batch site refund) and design and implementation of a refund tracking and refund system. This procedure would also adversely affect the amount of time required to complete the daily batch process for all submitted jobs. The developer's estimate is that the amount of physical time required to complete this process would increase by a factor of 2 to 3 times. The cost of this procedure could be prohibitive.

Attachment to response
to OCA/USPS-T1-57(i)

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.

Dated: 11/17/98

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.

K ʔ Hollies

Kenneth N. Hollies

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