

ORIGINAL

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

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OFFICE OF THE SECRETARY
OF THE POSTAL SERVICE

MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO QUESTIONS POSED AT THE HEARING ON NOVEMBER 18, 1998

The United States Postal Service hereby provides its responses to questions posed by the Presiding Officer, the Office of the Consumer Advocate, and Pitney Bowes at the hearing on November 18, 1998. Each question is paraphrased and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

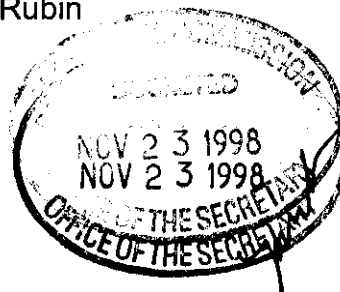
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

David H. Rubin

David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; Fax -5402
November 23, 1998



RESPONSE OF UNITED STATES POSTAL SERVICE
TO QUESTION POSED BY THE PRESIDING OFFICER
AT THE HEARING ON NOVEMBER 18, 1998

QUESTION (Tr. 5/904)

The Presiding Officer requested that the Postal Service provide specific information regarding when market test data will be filed with the Commission. While indicating that witness Garvey would be able to answer questions on this matter, *id.*, postal counsel also agreed to provide a written report.¹

RESPONSE:

During oral cross examination, witness Garvey expressed his expectation that information regarding the market test would begin flowing to the Commission "by the end of next week," by which he evidently meant the Friday after Thanksgiving. Tr. 5/1635. He also indicated that the quality of data provided would continue to improve in subsequent weeks. Tr. 5/1636-39.

Counsel discussed this matter with the contractors assisting in preparation of the reports. As of the afternoon of November 23, 1998, counsel expects to receive the first report on November 30, and file it a day or two thereafter.²

¹ Counsel later indicated that this report would not, as originally requested, be available on Friday, November 20. Tr. 7/1742-43.

² If participants need to rely upon the market test to develop their evidence, the procedural schedule already contemplates that such evidence may be filed on January 27, 1999. Presiding Officer's Ruling No. MC98-1/10.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO QUESTION POSED BY THE OFFICE OF THE CONSUMER ADVOCATE
AT THE HEARING ON NOVEMBER 18, 1998

QUESTION (Tr. 5/1019)

The OCA requested a statement from the Postal Service describing how print jobs are handled on postal-owned FTP servers located at printer sites.

RESPONSE:

Witness Garvey answered these questions during his oral cross-examination. Tr. 5/1589-90.

RESPONSE OF UNITED STATES POSTAL SERVICE TO QUESTION POSED BY
PITNEY BOWES AT THE HEARING ON NOVEMBER 18, 1998

QUESTION (Tr. 5/1069-70)

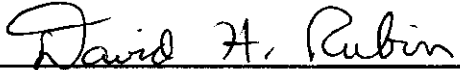
"In a request for some efficiency, Mr. Presiding Officer, instead of asking the witness to review the residue of the contract, could I ask that the Postal Service provide any reference in the contract that it believes to pertain to writing software -- proprietary software -- for the experimental phase of the MOL project?"

RESPONSE:

Pages 31 to 36 of the Netpost research and development contract (the last 6 pages of USPS-LR-7/MC98-1) pertain to writing software for Mailing Online, but do not specifically mention its experimental phase. Estimated costs of developing proprietary software for the experimental phase of Mailing Online should be included in the cost estimate provided by witness Garvey during the hearing on November 19 (Tr. 6/1512). An updated estimate of these costs will be presented as part of the supplemental evidence to be provided by January 14, 1999. See Notice of United States Postal Service Regarding Expected Filing Date for Supplemental Testimony, filed November 20, 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
David H. Rubin

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Washington, D.C. 20260-1137
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