

ORIGINAL

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Mailing Online Service)

Docket No. MC98-1

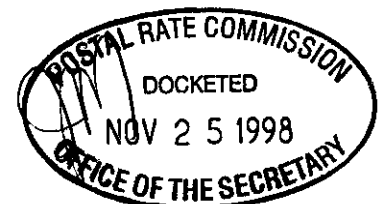
OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS: MICHAEL K. PLUNKETT
(OCA/USPS-T5-51)
(November 25, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits an interrogatory and request 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
Acting Director
Office of the Consumer Advocate

Emmett Rand Costich
Emmett Rand Costich
Acting Assistant Director



OCA/USPS-T5-51. Please refer to your response to OCA/USPS-T5-48. Please answer the following questions for 1) mailpieces meeting the existing minimum volume requirements, and 2) mailpieces meeting the existing minimum volume requirements as a result of being commingled with other mailpieces. For purposes of this interrogatory, "level of presort" and "depth of sort" are both defined to be a vector of integers whose elements are the volumes of a mailing that qualified for the various available presort discounts (as shown on a Qualification Report), the order of the elements being from greatest discount to no discount. For example, the Qualification Report appearing at Tr. 6/1423 reflects a "level of presort" or "depth of sort" of [0, 0, 0, 0, 0, 0, 1].

- a. Please confirm that for MOL First-Class batches, the types of data necessary for the processing center computer to determine the level of presort are
- i. job type;
 - ii. page count;
 - ii. address list ZIP+4 Codes, and;
 - iv. ZIP Code tables for print sites.

If you do not confirm, please explain, and identify all the types of data necessary to calculate the actual depth of sort.

- b. Please confirm that for MOL Standard (A) batches weighing 3.2985 ounces or less, the types of data necessary for the processing center computer to determine the level of presort are
- i. job type;

- ii page count;
- ii. address list ZIP+4 Codes, and;
- iv. ZIP Code tables for print sites.

If you do not confirm, please explain, and identify all the types of data necessary to calculate the actual depth of sort.

- c. Please confirm that for MOL Standard (A) batches weighing more than 3.2985 ounces, the types of data necessary for the processing center computer to determine the level of presort are

- i. job type;
- ii page count;
- ii. address list ZIP+4 Codes, and;
- iv. ZIP Code tables for print sites.

If you do not confirm, please explain, and identify all the types of data necessary to calculate the actual depth of sort.

- d. Do you agree with the definition of "level of presort" and "depth of sort" given at the beginning of this interrogatory? If not, please provide rigorous definitions of these terms. Please confirm that the depth of sort for any particular batch will always contain some zeros because the Qualification Report includes all possible presort levels for letters and flats and for First Class and Standard (A). If you do not confirm, please define each of the presort levels appearing on the Qualification Report shown at Tr. 6/1423.

- e. Please confirm that distributing batches to print sites does not cause any change in the depth of sort; i.e., the number of pieces qualifying for each discount would

be the same whether depth of sort were determined for a batch before or after distributing to print sites. If you do not confirm, please describe all situations in which distributing to print sites would cause pieces of a batch to lose qualification for a particular discount.

- f. In your response you refer to "a particular mailing [that] does not become part of a sufficiently large batch to have been presorted." Does the MOL system sort Standard (A) batches of 200 pieces? Does the MOL system sort First-Class batches of 200 pieces? If not, why not? What number of pieces constitutes "a sufficiently large batch"? What was the rationale for choice of this number?

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 25, 1998