

ORIGINAL

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

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U.S. DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL

MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PLUNKETT TO INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T5-51)

The United States Postal Service hereby provides the response of witness Plunkett to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T5-51, filed on November 25, 1998.

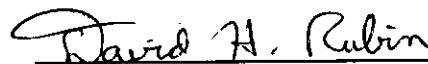
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

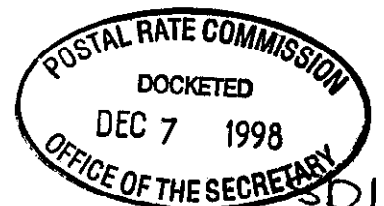
By its attorneys:

Daniel J. Foucheaux, Jr.
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December 7, 1998



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

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.

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- 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?

OCA/USPS-T5-51 Response:

- a-c. Confirmed. However, as witness Garvey indicated, the processing center computer will eventually have the capability of merging documents with different characteristics. When this change is made, most of the job type information will not be necessary to determine depth of sort.
- d. Yes. Confirmed.
- e. Not confirmed. Distribution of customer documents to print sites will affect the depth of sort that the mailing will attain. The nature and magnitude of the effect depends on what is meant by "before...distributing to print sites", and by the other documents that are present in the Mailing Online system. While I cannot describe all situations in which there would have been an effect, consider for example, a customer who submits a 400-piece Standard (A) mailing to Mailing Online, with 100 pieces going to each of four different 3-digit areas, each served by different printers. This mailing has presumably satisfied all of the existing qualification standards for basic automation rates. However, when that document is subsequently distributed to the

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four different print sites, four separate address lists are created and none of the four mailings would, under the existing DMCS, qualify for anything but First-Class Mail single piece rates. This assumes of course that the mailings in the instant case are not commingled with other jobs. Conversely, if one (or more) of the four 100-piece lists are joined with a larger mailing in the same 3-digit area, then those pieces may qualify for discounts for which the original mailing would not have qualified.

- f. Mailing Online presorts all batches, and therefore all documents of which mailings are comprised, irrespective of the number of pieces within a batch. The response should instead have referred to a mailing that lacks sufficient volume to have met existing minimum volume thresholds.

DECLARATION

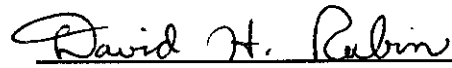
I, Michael K. Plunkett, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Michael K. Plunkett

Dated: DECEMBER 7, 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

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