

ORIGINAL

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

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OFFICE OF THE SECRETARY

MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
PITNEY BOWES, INC.
(PB/USPS-2-6)

The United States Postal Service hereby provides its responses to the following interrogatories of Pitney Bowes, Inc.: PB/USPS-2-6, filed on January 27, 1999.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

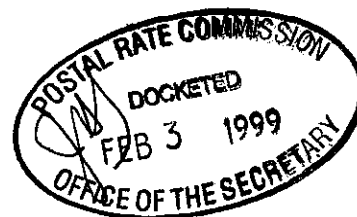
By its attorneys:

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February 3, 1999



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TO INTERROGATORY OF PITNEY BOWES

PB/USPS-2. Table 1 of the MOL bi-weekly report for A/P2 Week 3 to A/P2 Week 4 shows two transactions which had, respectively, 501 to 1000 pieces and 1001 to 2500 pieces. Table 3 shows three batches processed during this period with a total of five pieces. Please reconcile this apparent inconsistency.

RESPONSE:

Table 1 of the bi-weekly report actually shows 8 transactions: 6 between 1 and 100 pieces, 1 between 501 and 1000 pieces and 1 between 1001-2500 pieces.

The figures between Table 1 and Table 3 will not match due to the following:

1. Table 1 is based on transaction date.
2. Table 3 is based on batch status date, which is the date when the final status of the batch is entered into the system. For most batches this date coincides with or is slightly after when the batch is mailed.
3. Since the cutoff for batch processing is 2pm, a batch may include transactions for that day as well as transactions that were ordered after 2pm the day before. Given this, is it not possible to relate the batches back to the transaction date, which is why the status date is reported instead.
4. When batch processing time is added, it is unlikely that a transaction will be mailed the same day the transaction is ordered. As a result, towards the end of a reporting period, certain transactions may not be included in the batch information for the same period. These transactions would then be included in the batching information included in the following period's report.

Table 1. Reconciliation of Transaction Versus Batch Information Reported

Transaction Date	Pieces	Batch Status Date	Pieces	Batch Info. Appears In...
10/31/98	4	11/3/98	1	Bi-weekly 2:3-2:4
		11/4/98	3	Bi-weekly 2:3-2:4
11/3/98	1	11/5/98	1	Bi-weekly 2:3-2:4
11/5/98	1,890	11/7/98	1,085	Bi-weekly 3:1-3:2
		11/7/98	3	Bi-weekly 3:1-3:2
		11/7/98	802	Bi-weekly 3:1-3:2
11/6/98	5	11/7/98	2	Bi-weekly 3:1-3:2
		11/9/98	3	Bi-weekly 3:1-3:2
TOTAL	1,900		1,900	

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PB/USPS-3. As noted, Table 3 shows three batches within the report period, but the Printer Site Logs at Appendix 1 lists five batches. Please reconcile this apparent inconsistency.

RESPONSE:

The batches listed in Appendix 1 and the batches listed in Table 3 will not match. The batches in Table 3 are listed by batch status date, while the batches listed in the printer site logs list the date the batch was received at the print site and the date the batch was mailed. Since the batch status date occurs on or after the day the batch was mailed, there will be instances when the list of batches in Appendix one will not match the list of batches in Table 3 due to the cutoff in the reporting period for the bi-weekly reports.

Table 2. Reconciliation of Batch Information Reported Versus Printer Site Logs

Batch Number	Batch Received Date	Batch Mail Date	Batch Status Date	Batch Info. Appears In...
B0000007	11/2/98	11/3/98	11/3/98	Bi-weekly 2:3-2:4
B0000008	11/3/98	11/4/98	11/4/98	Bi-weekly 2:3-2:4
B0000011	11/4/98	11/5/98	11/5/98	Bi-weekly 2:3-2:4
B0000013	11/5/98	11/6/98	11/7/98	Bi-weekly 3:1-3:2
B0000014	11/5/98	11/6/98	11/7/98	Bi-weekly 3:1-3:2

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PB/USPS-4. Is it a correct reading of Appendix 3.1 that the eight transactions reported on Table 1 generated nine separate telephone calls? If not, please describe the transactions to which any calls not relating to the six transactions did relate.

RESPONSE:

No. There can be cases where people who did not conduct transactions with Mailing Online could generate a Mailing Online call. For example, a registered customer could inquire about Mailing Online and later decide not to conduct a transaction, thereby generating a call that cannot be attributed to a specific transaction. There is currently no ability to trace a specific call to a specific transaction.

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PB/USPS-5. The three Forms 3600-R produced in conjunction with the bi-weekly data report for A/P2 Weeks 3 and 4 correspond in dates and volumes to the volumes per batch reported at Table 3, but not with the Printer Site Logs at Appendix 1. Please reconcile this apparent discrepancy.

RESPONSE:

The 3600-R forms are being provided to correspond to the batches listed in Table 3. As such, those batches that appear in Appendix 1 but do not appear in Table 3 will not have corresponding Forms 3600-R. Forms 3600-R for these batches will appear in the A/P 3 Weeks 1 and 2 bi-weekly report. Please refer to the response to PB/USPS-2 above.

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PB/USPS-6. The Forms 3600-R appear initially to have been printed charging Part C non-automation rates and subsequently corrected by hand to apply the basic automation rate. Is this an accurate reading of the forms and, if so, please explain why the non-automation rate was initially applied and by whom. If the reading is not accurate, please provide an accurate explanation for the apparent alteration of the forms.

RESPONSE:

The PostalSoft software used to sort Mailing Online mailings had to be modified to handle mailings of less than the minimum piece volume normally required for the applicable postage rates. Before that modification, mailings with less than the minimum volumes were defaulted by the software to single-piece rates. The printer then corrected the Postage Statement by hand to reflect the automation basic rates before presenting it to the Business Mail Acceptance Unit for verification. The software modification was recently implemented and reports generated subsequent to the modification will not need manual editing.

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.



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