

ORIGINAL

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

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U.S. DEPT. OF JUSTICE

Mailing Online Service)

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-37-61)
February 19, 1999

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests 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.

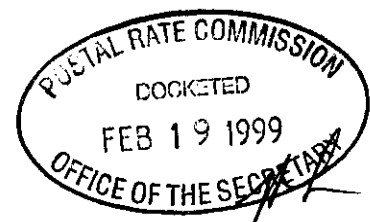
Respectfully submitted,

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OCA/USPS-37. In a response (filed February 12, 1999) to a question posed at the February 5 hearing at Tr. 8/1987-88, the Postal Service indicated that it may have excluded operational and market test costs for Mailing Online.

- a. Please state whether this is the Postal Service's position.
- b. If this is the position of the Postal Service, please describe in detail the specific criteria applied in separating operational and market test costs and/or expenditures from those of the Mailing Online experiment.

OCA/USPS-38. USPS-LR-29/MC98-1 ("LR 29") is entitled "Compaq Contract, Delivery Orders and Task Orders for PostOffice Online." However, throughout the library reference, the contractor is identified as Digital Equipment Corporation. In addition, witness Lim's Exh. A, items 61-64, refers to Marconi as the manufacturer responsible for software enhancements, MOL application development, and MOL testing and documentation. Please explain the apparent discrepancies.

OCA/USPS-39. The original contract (dated 11/7/97 [the date is not very legible, possibly it is 11/9/97]) describes the statement of work as the development of "Desktop Post Office."

- a. What is "Desktop Post Office" and what is its connection to MOL and POL?
- b. Section 1 of the statement of work describes Phase 1 as the:

Design and development of a Pilot DTPO product (software, hardware & documentation) that can pass USPS Acceptance Test Requirements in a formal System Test to be conducted January 9-30, 1998.

Did witness Lim treat these Phase 1 activities as attributable to MOL?

- i. If not, were they excluded from the attributable costs of MOL because they were considered “pre-experiment,” i.e., part of the operations test phase or the market test phase? Please explain.
- ii. If not, were they excluded from the attributable costs of MOL because they were considered POL costs, not MOL costs? Please explain.
- iii. If not, were they excluded from the attributable costs of MOL because they were considered start-up costs rather than on-going costs? Please explain.
- iv. If there were any other reasons for not treating the Phase 1 costs as attributable to MOL, please present these in detail.

c. Section 1 of the statement of work describes Phase 2A as:

Support an Operations-Limited Market test of the DTPO product. The test will last for a period of three months commencing January 31 and ending April 30, 1998.

Did witness Lim treat these Phase 2A activities as attributable to MOL?

- i. If not, were they excluded from the attributable costs of MOL because they were considered “pre-experiment,” i.e., part of the operations test phase or the market test phase? Please explain.
- ii. If not, were they excluded from the attributable costs of MOL because they were considered POL costs, not MOL costs? Please explain.
- iii. If not, were they excluded from the attributable costs of MOL because they were considered start-up costs rather than on-going costs? Please explain.

iv. If there were any other reasons for not treating the Phase 2A costs as attributable to MOL, please present these in detail.

d. Section 1 of the statement of work describes Phase 2B as:

The Expanded Market Test will incorporate new products and services as well as payment methodologies The Expanded Market test will run from May 1 to September 30, 1998. . . .

Did witness Lim treat these Phase 2B activities as attributable to MOL?

i. If not, were they excluded from the attributable costs of MOL because they were considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.

ii. If not, were they excluded from the attributable costs of MOL because they were considered POL costs, not MOL costs? Please explain.

iii. If not, were they excluded from the attributable costs of MOL because they were considered start-up costs rather than on-going costs? Please explain.

iv. If there were any other reasons for not treating the Phase 2B costs as attributable to MOL, please present these in detail.

e. Section 1 of the statement of work describes Phase 3 as:

National deployment of a production version of the DTPO product beginning October 1, 1998, and targeted for full scale deployment by March 31, 1999.

Did witness Lim treat these Phase 3 activities as attributable to MOL?

i. If not, were they excluded from the attributable costs of MOL because they were considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.

- ii. If not, were they excluded from the attributable costs of MOL because they were considered POL costs, not MOL costs? Please explain.
- iii. If not, were they excluded from the attributable costs of MOL because they were considered start-up costs rather than on-going costs? Please explain.
- iv. If there were any other reasons for not treating the Phase 3 costs as attributable to MOL, please present these in detail.

OCA/USPS-40. The last page of the original contract (dated 11/7/97 [the date is not very legible, possibly it is 11/9/97]) is headed "Section 1-List of Attachments." Attachments A-L are listed but not provided. Please provide copies of these attachments.

OCA/USPS-41. Modification No. 4, dated 3/11/98, of Contract No. 102590-98-B-0351, provides for 6 months of the Help Desk at a cost of \$100,000 per month.

- a. Please provide a breakdown of the \$100,000 per month figure into labor, hardware, software, telecommunications, and other costs.
- b. Did witness Lim treat these \$100,000 per month Help Desk costs as attributable to MOL?
 - i. If not, were they excluded from the attributable costs of MOL because they were considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
 - ii. If not, were they excluded from the attributable costs of MOL because they were considered POL costs, not MOL costs? Please explain.

- iii. If not, were they excluded from the attributable costs of MOL because they were considered to be partly start-up costs rather than on-going costs? Please explain.
 - iv. If there were any other reasons for not treating the \$100,000 per month Help Desk costs as attributable to MOL, please present these in detail.
- c. Also explain what kind of work is covered by the \$403,100 modification for "T&M."
- d. Does "T&M" stand for time and materials?
- e. Did witness Lim treat these \$403,100 of T&M costs as attributable to MOL?
- i. If not, were they excluded from the attributable costs of MOL because they were considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
 - ii. If not, were they excluded from the attributable costs of MOL because they were considered POL costs, not MOL costs? Please explain.
 - iii. If not, were they excluded from the attributable costs of MOL because they were considered start-up costs rather than on-going costs? Please explain.
 - iv. If there were any other reasons for not treating the \$403,100 costs as attributable to MOL, please present these in detail.
- f. A schematic is presented for "Post Office Online-Phase 2A" that includes an abbreviation "COTS." What does COTS stand for?

- g. Modification No. 5 of the contract, dated 3/31/98, adds \$176,877 for “services and travel” related to “directed changes and troubleshooting”—“because of the Postal Service delay due to Customer Acceptance Testing.”

Did witness Lim treat this \$176,877 cost as attributable to MOL?

- i. If not, was it excluded from the attributable costs of MOL because it was considered “pre-experiment,” i.e., part of the operations test phase or the market test phase? Please explain.
- ii. If not, was it excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.
- iii. If not, was it excluded from the attributable costs of MOL because it was considered a start-up cost rather than an on-going cost? Please explain.
- iv. If there were any other reasons for not treating the \$176,877 cost as attributable to MOL, please present these in detail.

OCA/USPS-42. One of the items included in LR 29 is Delivery Order 102590-98-D-3091, dated September 9, 1998, and consists of a Technical & Cost Proposal for the PostOffice Online Support Center (dated September 8, 1998).

- a. Section 2.2.9 of the Statement of Work requires CSRs to have access to America Online.
 - i. Why is this access necessary?
 - ii. What is a CSR?

- b. Section 4.1 of the Pricing and Cost Estimates lists the Startup Costs of the POL Support Center as: (1) Facility Construction, (2) LAN Installation, (3) Documentation, and (4) Other Direct Costs.
- i. Did witness Lim treat the Facility Construction Startup costs of \$142,190 (section 4.1.1, page 29) as attributable to MOL?
- A. If not, were they excluded from the attributable costs of MOL because they were considered “pre-experiment,” i.e., part of the operations test phase or the market test phase? Please explain.
- B. If not, were they excluded from the attributable costs of MOL because they were considered POL costs, not MOL costs? Please explain.
- C. If not, were they excluded from the attributable costs of MOL because they were considered start-up costs rather than on-going costs? Please explain.
- D. If there were any other reasons for not treating the Facility Construction Startup costs as attributable to MOL, please present these in detail.
- ii. Did witness Lim treat the LAN Installation costs of \$203,924 (section 4.1.2, page 30) as attributable to MOL?
- A. If not, were they excluded from the attributable costs of MOL because they were considered “pre-experiment,” i.e., part of the operations test phase or the market test phase? Please explain.

- B. If not, were they excluded from the attributable costs of MOL because they were considered POL costs, not MOL costs? Please explain.
 - C. If not, were they excluded from the attributable costs of MOL because they were considered start-up costs rather than on-going costs? Please explain.
 - D. If there were any other reasons for not treating the LAN Installation costs as attributable to MOL, please present these in detail.
- iii. Did witness Lim treat the Documentation costs of \$69,607 (section 4.1.3, page 31) as attributable to MOL?
 - A. If not, were they excluded from the attributable costs of MOL because they were considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
 - B. If not, were they excluded from the attributable costs of MOL because they were considered POL costs, not MOL costs? Please explain.
 - C. If not, were they excluded from the attributable costs of MOL because they were considered start-up costs rather than on-going costs? Please explain.
 - D. If there were any other reasons for not treating the Documentation costs as attributable to MOL, please present these in detail.
- iv. Did witness Lim treat the Other Direct costs of \$26,476 (section 4.1.4, page 31) as attributable to MOL?

- A. If not, were they excluded from the attributable costs of MOL because they were considered “pre-experiment,” i.e., part of the operations test phase or the market test phase? Please explain.
 - B. If not, were they excluded from the attributable costs of MOL because they were considered POL costs, not MOL costs? Please explain.
 - C. If not, were they excluded from the attributable costs of MOL because they were considered start-up costs rather than on-going costs? Please explain.
 - D. If there were any other reasons for not treating the Documentation costs as attributable to MOL, please present these in detail.
- c. Section 4.2 of the Pricing and Cost Estimates lists the Operation and Maintenance Costs of the POL Support Center as: (1) Facility Monthly Charges, (2) Telephony and Alarm Systems, (3) Staffing, and (4) Documentation.
 - i. Did witness Lim treat the Monthly Facility Charges of \$11,650 (section 4.2.1, page 32) as attributable to MOL?
 - A. If not, were they excluded from the attributable costs of MOL because they were considered “pre-experiment,” i.e., part of the operations test phase or the market test phase? Please explain.
 - B. If not, were they excluded from the attributable costs of MOL because they were considered POL costs, not MOL costs? Please explain.

- C. If not, were they excluded from the attributable costs of MOL because they were considered start-up costs rather than on-going costs? Please explain.
 - D. If there were any other reasons for not treating the Monthly Facility Charges as attributable to MOL, please present these in detail.
 - E. If they were treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$11,650 figure contained in the Pricing and Cost Estimates section of the POL Support Center Proposal with witness Lim's attribution.
- ii. Did witness Lim treat the Monthly Telephony and Alarm Systems costs of \$668 (section 4.2.2, page 33) as attributable to MOL?
- A. If not, were they excluded from the attributable costs of MOL because they were considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
 - B. If not, were they excluded from the attributable costs of MOL because they were considered POL costs, not MOL costs? Please explain.
 - C. If not, were they excluded from the attributable costs of MOL because they were considered start-up costs rather than on-going costs? Please explain.

- D. If there were any other reasons for not treating the Monthly Telephony and Alarm Systems costs as attributable to MOL, please present these in detail.
 - E. If they were treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$668 figure contained in the Pricing and Cost Estimates section of the POL Support Center Proposal with witness Lim's attribution.
- iii. Did witness Lim treat the Monthly Staffing costs of \$538,473 (section 4.2.3, page 35) as attributable to MOL?
- A. If not, were they excluded from the attributable costs of MOL because they were considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
 - B. If not, were they excluded from the attributable costs of MOL because they were considered POL costs, not MOL costs? Please explain.
 - C. If not, were they excluded from the attributable costs of MOL because they were considered start-up costs rather than on-going costs? Please explain.
 - D. If there were any other reasons for not treating the Monthly Staffing costs as attributable to MOL, please present these in detail.

- E. If they were treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$538,473 figure contained in the Pricing and Cost Estimates section of the POL Support Center Proposal with witness Lim's attribution.
- iv. Did witness Lim treat the Monthly Operations Other Direct Charges of \$45,553 (section 4.2.4, page 36) as attributable to MOL?
- A. If not, were they excluded from the attributable costs of MOL because they were considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
- B. If not, were they excluded from the attributable costs of MOL because they were considered POL costs, not MOL costs? Please explain.
- C. If not, were they excluded from the attributable costs of MOL because they were considered start-up costs rather than on-going costs? Please explain.
- D. If there were any other reasons for not treating the Monthly Operations Other Direct Charges as attributable to MOL, please present these in detail.
- E. If they were treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a

reconciliation (or crosswalk) between the \$45,553 figure contained in the Pricing and Cost Estimates section of the POL Support Center Proposal with witness Lim's attribution.

OCA/USPS-43. One of the items included in LR 29 is Delivery Order 102590-98-D-2430, Modification No. 1, dated December 23, 1998, and consists of a "modification [that] adds funding for the POL/MOL Integration, and extends the period of performance through March 31, 1998 [sic]." The Task Order (Short Format) contains the following description of work: "This Delivery Order is for POST OFFICE ONLINE and MAILING ONLINE to provide a new upgraded version of Mailing Online capable of handling a national expansion of the POL and integrate it into the POL. Work to be performed according to the attached Statement of Work."

- a. Contracting Officer Theresa Downer signed Modification No. 1 on 12/23/98. She signed the Task Order (Short Format) on 7/24/98. How can execution dates of 7/24/98 and 12/23/98 extend the "period of performance through March 31, 1998?"
- b. The "New Grand Total" for the Delivery Order and Modification No. 1 is stated to be \$1,198,060. Did witness Lim treat the \$1,198,060 as attributable to MOL?
 - i. If not, was the \$1,198,060 cost excluded from the attributable costs of MOL because it was considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.

- ii. If not, was the \$1,198,060 cost excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.
 - iii. If not, was the \$1,198,060 excluded from the attributable costs of MOL because it was considered a start-up cost rather than on-going cost? Please explain.
 - iv. If there were any other reasons for not treating the \$1,198,060 cost as attributable to MOL, please present these in detail.
 - v. If the \$1,198,060 cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$1,198,060 figure contained in the Delivery Order (including Modification No. 1) with witness Lim's attribution.
- c. The Mailing Online Statement of Work ("SOW"), dated May 30, 1998, drafted by Mitretek, is provided as part of LR 29.
- i. Page iii of the SOW describes Post Office Online as consisting of two subset programs—Shipping Online and Mailing Online. Please list all services falling under the rubric of Shipping Online. Include in this description whether Express Mail tracking and Priority Mail Delivery Confirmation are considered part of Shipping Online.
 - ii. Page iii also describes a "USPS pilot Mailing Online system . . . currently being tested by approximately 50 users in Florida."

- A. Is this 50-user test the operations test that was conducted prior to the commencement of the market test on October 30, 1998?
Please explain.
- B. What are the costs associated with the 50-user test?
- C. Have the costs associated with the 50-user test been included in the attributable costs developed by witness Lim? If not, why not?
- D. Have the costs associated with the 50-user test been included in the "Information Systems—Variable" cost of \$.0021 presented by witness Seckar in his revised Worksheet 1, page 2, that updates his response to a November 20 Hearing Question (Tr. 8/1881)? If not, why not?
- E. Have the costs associated with the 50-user test been included in the "Information Systems—One-Time" cost of \$.0020 presented by witness Seckar in his revised Worksheet 1, page 2, that updates his response to a November 20 Hearing Question (Tr. 8/1881)? If not, why not?
- F. If the costs associated with the 50-user test have not been included in either of the "Information Systems" unit costs of \$.0021 nor \$.0020, then are these costs otherwise included in the "one-time" information costs that witness Plunkett cites in his response to part a. of interrogatory OCA/USPS-T5-10, revised January 14, 1999 (Tr. 8/1765)? If not, why not?

- G. Are the costs associated with the 50-user test included in the costs analyzed in the attachment to witness Plunkett's response to interrogatory OCA/USPS-T5-10 (Tr. 8/1767)? If not, why not?
- iii. Section 1, Introduction, of the SOW, at page 1, cites a study performed by National Analysis Research and Consulting ("NARC"). Entitled "NetPost Concept Feasibility Study Quantitative Research Findings."
- A. Is this the library reference, USPS-LR-2/MC98-1, sponsored by witness Rothschild?
- B. What moneys were paid to NARC to perform the NetPost Concept Feasibility Study?
- C. Have the costs of the contract between the Postal Service and NARC been included in the attributable costs presented by witness Lim? If not, why not? If the NARC study cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the NARC study cost with witness Lim's attribution.
- D. Have the costs associated with NARC study been included in the "Information Systems—Variable" cost of \$.0021 presented by witness Seckar in his revised Worksheet 1, page 2, that updates his response to a November 20 Hearing Question (Tr. 8/1881)? If not, why not?

- E. Have the costs associated with the NARC study been included in the "Information Systems—One-Time" cost of \$.0020 presented by witness Seckar in his revised Worksheet 1, page 2, that updates his response to a November 20 Hearing Question (Tr. 8/1881)? If not, why not?
- F. If the costs associated with the NARC study have not been included in either of the "Information Systems" unit costs of \$.0021 nor \$.0020, then are these costs otherwise included in the "one-time" information costs that witness Plunkett cites in his response to part a. of interrogatory OCA/USPS-T5-10, revised January 14, 1999 (Tr. 8/1765)? If not, why not?
- G. Are the costs associated with the NARC study included in the costs analyzed in the attachment to witness Plunkett's response to interrogatory OCA/USPS-T5-10 (Tr. 8/1767)? If not, why not?

OCA/USPS-44. One of the items included in LR 29 is Contract/Order 102590-98-D-2430, Modification No. 4, dated 11/3/98, and consists of a "New Grand Total" of \$950,000. The modification "authorizes Digital to perform the requirements in their technical and cost proposal for the PostOffice Online Support Center. . . ." Did witness Lim treat this \$950,000 cost as attributable to MOL?

- a. If not, was it excluded from the attributable costs of MOL because it was considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.

- b. If not, was it excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.
- c. If not, was it excluded from the attributable costs of MOL because it was considered a start-up cost rather than an on-going cost? Please explain.
- d. If there were any other reasons for not treating the \$950,000 cost as attributable to MOL, please present these in detail.
- e. If the \$950,000 cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$950,000 figure contained in Modification No. 5 with witness Lim's attribution.

OCA/USPS-45. One of the items included in LR 29 is Contract/Order 102590-98-D-2430, Modification No. 5, dated December 23, 1998, and consists of \$310,000 in funding added to the \$950,000 discussed in the previous interrogatory (with respect to Modification No. 4). The modification "adds funding for development work for the POL Market Test." Did witness Lim treat this \$310,000 cost as attributable to MOL?

- a. If not, was it excluded from the attributable costs of MOL because it was considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
- b. If not, was it excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.

- c. If not, was it excluded from the attributable costs of MOL because it was considered a start-up cost rather than an on-going cost? Please explain.
- d. If there were any other reasons for not treating the \$310,000 cost as attributable to MOL, please present these in detail.
- e. If the \$310,000 cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$310,000 figure contained in Modification No. 5 with witness Lim's attribution.

OCA/USPS-46. One of the items included in LR 29 is Delivery Order 102590-98-D-1665 (dated 4/2/98), in the amount of \$25,000. The Delivery Order is for:

the continuing program management support during the first option period of the parent POL contract. . . . Support will include, but not be limited to, attending weekly program review meetings, planning enhancements and POL development projects, assessing scalability of current design, reviewing external applications for integration, and assessing technology advances and design improvements.

Did witness Lim treat this \$25,000 cost as attributable to MOL?

- a. If not, was it excluded from the attributable costs of MOL because it was considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
- b. If not, was it excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.
- c. If not, was it excluded from the attributable costs of MOL because it was considered a start-up cost rather than an on-going cost? Please explain.

- d. If there were any other reasons for not treating the \$25,000 cost as attributable to MOL, please present these in detail.
- e. If the \$25,000 cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$25,000 figure contained in the Deliver Order with witness Lim's attribution.

OCA/USPS-47. One of the items included in LR 29 is Modification No. 1 of Delivery Order 102590-98-D-1665 (dated 4/30/98), in the amount of \$150,000.

Did witness Lim treat this \$150,000 cost as attributable to MOL?

- a. If not, was it excluded from the attributable costs of MOL because it was considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
- b. If not, was it excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.
- c. If not, was it excluded from the attributable costs of MOL because it was considered a start-up cost rather than an on-going cost? Please explain.
- d. If there were any other reasons for not treating the \$150,000 cost as attributable to MOL, please present these in detail.
- e. If the \$150,000 cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk)

between the \$150,000 figure contained in the Modification with witness Lim's attribution.

OCA/USPS-48. One of the items included in LR 29 is Modification No. 3 of Delivery Order 102590-98-D-1665 (dated 9/3/98), in the amount of \$330,000, "to support existing tasks." Did witness Lim treat this \$330,000 cost as attributable to MOL?

- a. If not, was it excluded from the attributable costs of MOL because it was considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
- b. If not, was it excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.
- c. If not, was it excluded from the attributable costs of MOL because it was considered a start-up cost rather than an on-going cost? Please explain.
- d. If there were any other reasons for not treating the \$330,000 cost as attributable to MOL, please present these in detail.
- e. If the \$330,000 cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$330,000 figure contained in the Modification with witness Lim's attribution.

OCA/USPS-49. One of the items included in LR 29 is Modification No. 4 of Delivery Order 102590-98-D-1665 (dated 12/23/98), in the amount of \$100,000.

Did witness Lim treat this \$100,000 cost as attributable to MOL?

- a. If not, was it excluded from the attributable costs of MOL because it was considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
- b. If not, was it excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.
- c. If not, was it excluded from the attributable costs of MOL because it was considered a start-up cost rather than an on-going cost? Please explain.
- d. If there were any other reasons for not treating the \$100,000 cost as attributable to MOL, please present these in detail.
- e. If the \$100,000 cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$100,000 figure contained in the Modification with witness Lim's attribution.

OCA/USPS-50. Delivery Order 102590-98-D-1665 includes an attachment entitled "PostOffice Online Project Extension Accounting Summary." The costs for two items are listed in this Accounting Summary. They are the following:

(1) Total cost for bugs (2/15-3/7): \$32,571.88

(2) Total cost for changes (2/15-3/7): \$154,278.00

- a. Did witness Lim treat the \$32,571.88 cost as attributable to MOL?

- i. If not, was it excluded from the attributable costs of MOL because it was considered “pre-experiment,” i.e., part of the operations test phase or the market test phase? Please explain.
 - ii. If not, was it excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.
 - iii. If not, was it excluded from the attributable costs of MOL because it was considered a start-up cost rather than an on-going cost? Please explain.
 - iv. If there were any other reasons for not treating the \$32,571.88 cost as attributable to MOL, please present these in detail.
 - v. If the \$32,571.88 cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$32,571.88 figure contained in the Accounting Summary with witness Lim’s attribution.
- b. Did witness Lim treat the \$154,278 cost as attributable to MOL?
- i. If not, was it excluded from the attributable costs of MOL because it was considered “pre-experiment,” i.e., part of the operations test phase or the market test phase? Please explain.
 - ii. If not, was it excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.
 - iii. If not, was it excluded from the attributable costs of MOL because it was considered a start-up cost rather than an on-going cost? Please explain.

- iv. If there were any other reasons for not treating the \$154,278 cost as attributable to MOL, please present these in detail.
- v. If the \$154,278 cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$154,278 figure contained in the Accounting Summary with witness Lim's attribution.

OCA/USPS-51. In LR 29, immediately following the "PostOffice Online Project Extension Accounting Summary" is a document entitled "Work Description of Requested Modificcations to the PostOffice Online Period covering Feb. 16, 1998-Mar. 9, 1998." The document contains "a description of additional work that has been requested by Postal as a modification to the Phase 1 PostOffice Online firm fixed price contract (#102590-98-B-0351)." Eight additional work items are presented. Five appear to be relevant to MOL. They are the following:

- (1) Item #2, Service Commitment Data Integration: \$6278
- (2) Item #5, Postal Forum PostOffice Online Demonstration Development:
\$12,118
- (3) Item #6, Development of a PostOffice Online Operations Guide: \$20,110
- (4) Item #7, PostOffice Online Operations Training: \$5402
- (5) Item #8, Postal Private Routed Network (PRN) Troubleshooting Support:
\$27,187

Did witness Lim treat any of the 5 costs listed above as attributable to MOL?

- a. If not, were they excluded from the attributable costs of MOL because they were considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
- b. If not, were they excluded from the attributable costs of MOL because they were considered POL costs, not MOL costs? Please explain.
- c. If not, were they excluded from the attributable costs of MOL because they were considered start-up costs rather than on-going costs? Please explain.
- d. If there were any other reasons for not treating the 5 cost items as attributable to MOL, please present these in detail.
- e. Please discuss parts a.-d. of this interrogatory separately for each of the 5 cost items.
- f. If any of the 5 cost items was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the 5 cost items with witness Lim's attribution. Please provide a separate citation and reconciliation separately for each of the 5 cost items.

OCA/USPS-52. One of the items included in LR 29 is Order No. 102590-98-D-2108 (dated 5/6/98), in the amount of \$425,000. The Delivery Order is for "POST OFFICE ONLINE CHANGES AND ENHANCEMENTS as initially defined in the attached Statement of Work and in further JAD sessions." Did witness Lim treat this \$425,000 cost as attributable to MOL?

- a. If not, was it excluded from the attributable costs of MOL because it was considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
- b. If not, was it excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.
- c. If not, was it excluded from the attributable costs of MOL because it was considered a start-up cost rather than an on-going cost? Please explain.
- d. If there were any other reasons for not treating the \$425,000 cost as attributable to MOL, please present these in detail.
- e. If the \$425,000 cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$425,000 figure contained in the Delivery Order with witness Lim's attribution.

OCA/USPS-53. Modification No. 1 (dated 9/3/98) to Delivery Order No. 102590-98-D-2108 added \$1,300,000 in funding. This Modification "extends the period of performance through January 15, 1999 . . . to perform continued support." Did witness Lim treat this \$1,300,000 cost as attributable to MOL?

- a. If not, was it excluded from the attributable costs of MOL because it was considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.

- b. If not, was it excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.
- c. If not, was it excluded from the attributable costs of MOL because it was considered a start-up cost rather than an on-going cost? Please explain.
- d. If there were any other reasons for not treating the \$1,300,000 cost as attributable to MOL, please present these in detail.
- e. If the \$1,300,000 cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$1,300,000 figure contained in the Modification with witness Lim's attribution.

OCA/USPS-54. Modification No. 2 (dated 12/23/98) to Delivery Order No.

102590-98-D-2108 added \$800,000 in funding. This Modification "incorporate[s] additional funding for development work For POL Market Test thru January 31, 1999." Did witness Lim treat this \$800,000 cost as attributable to MOL?

- a. If not, was it excluded from the attributable costs of MOL because it was considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
- b. If not, was it excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.
- c. If not, was it excluded from the attributable costs of MOL because it was considered a start-up cost rather than an on-going cost? Please explain.

- d. If there were any other reasons for not treating the \$800,000 cost as attributable to MOL, please present these in detail.
- e. If the \$800,000 cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$800,000 figure contained in the Modification with witness Lim's attribution.

OCA/USPS-55. One of the items included in LR 29 is Delivery Order No. 102590-98-D-3231 (dated 8/19/98), in the amount of \$133,325. The Delivery Order is "for POST OFFICE ONLINE HELP DESK REMEDY DEVELOPMENT for expansion and national roll out." Did witness Lim treat this \$133,325 cost as attributable to MOL?

- a. If not, was it excluded from the attributable costs of MOL because it was considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
- b. If not, was it excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.
- c. If not, was it excluded from the attributable costs of MOL because it was considered a start-up cost rather than an on-going cost? Please explain.
- d. If there were any other reasons for not treating the \$133,325 cost as attributable to MOL, please present these in detail.

- e. If the \$133,325 cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$133,325 figure contained in the Delivery Order with witness Lim's attribution.

OCA/USPS-56. One of the items included in LR 29 is Delivery Order No. 102590-98-D-1851 (dated 4/16/98), in the amount of \$50,000. The Delivery Order is "Scalability Analysis for USPS Post Office Online." Did witness Lim treat this \$50,000 cost as attributable to MOL?

- a. If not, was it excluded from the attributable costs of MOL because it was considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
- b. If not, was it excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.
- c. If not, was it excluded from the attributable costs of MOL because it was considered a start-up cost rather than an on-going cost? Please explain.
- d. If there were any other reasons for not treating the \$50,000 cost as attributable to MOL, please present these in detail.
- e. If the \$50,000 cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk)

between the \$50,000 figure contained in the Delivery Order with witness Lim's attribution.

OCA/USPS-57. Modification No. 2 (dated 9/3/98) added funding of \$190,000 to Delivery Order No. 102590-98-D-1851. The Modification "extends the period of performance through January 15, 1999 and . . . perform[s] continued support."

Did witness Lim treat this \$190,000 cost as attributable to MOL?

- a. If not, was it excluded from the attributable costs of MOL because it was considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
- b. If not, was it excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.
- c. If not, was it excluded from the attributable costs of MOL because it was considered a start-up cost rather than an on-going cost? Please explain.
- d. If there were any other reasons for not treating the \$190,000 cost as attributable to MOL, please present these in detail.
- e. If the \$190,000 cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$190,000 figure contained in the Modification with witness Lim's attribution.

OCA/USPS-58. One of the items included in LR 29 is Delivery Order No.

102590-98-D-1850 (dated 4/16/98), in the amount of \$25,000. The Delivery

Order is for "Application support for POL in San Mateo, CA." Did witness Lim treat this \$25,000 cost as attributable to MOL?

- a. If not, was it excluded from the attributable costs of MOL because it was considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
- b. If not, was it excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.
- c. If not, was it excluded from the attributable costs of MOL because it was considered a start-up cost rather than an on-going cost? Please explain.
- d. If there were any other reasons for not treating the \$25,000 cost as attributable to MOL, please present these in detail.
- e. If the \$25,000 cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$25,000 figure contained in the Delivery Order with witness Lim's attribution.

OCA/USPS-59. Modification No. 1 (dated 7/17/98) to Delivery Order No. 102590-98-D-1850 added funding of \$50,000. The Modification "adds \$50,000 . . . for San Mateo support under Post Office Online. . . ." Did witness Lim treat this \$50,000 cost as attributable to MOL?

- a. If not, was it excluded from the attributable costs of MOL because it was considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
- b. If not, was it excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.
- c. If not, was it excluded from the attributable costs of MOL because it was considered a start-up cost rather than an on-going cost? Please explain.
- d. If there were any other reasons for not treating the \$50,000 cost as attributable to MOL, please present these in detail.
- e. If the \$50,000 cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$50,000 figure contained in the Modification with witness Lim's attribution.

OCA/USPS-60. Modification No. 2 (dated 9/3/98) to Delivery Order No. 102590-98-D-1850 added funding of \$250,000. The Modification "extends the period of performance through January 15, 1999 and adds \$250,000 to perform continued support." Did witness Lim treat this \$250,000 cost as attributable to MOL?

- a. If not, was it excluded from the attributable costs of MOL because it was considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.

- b. If not, was it excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.
- c. If not, was it excluded from the attributable costs of MOL because it was considered a start-up cost rather than an on-going cost? Please explain.
- d. If there were any other reasons for not treating the \$250,000 cost as attributable to MOL, please present these in detail.
- e. If the \$250,000 cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$250,000 figure contained in the Modification with witness Lim's attribution.

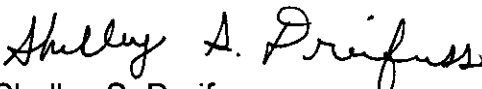
OCA/USPS-61. One of the items contained in LR 29 is Delivery Order No. 102590-98-D-3294 in the amount of \$95,000. The Deliver Order is for POST OFFICE ONLINE CALL CENTER ASSESSMENT." Did witness Lim treat this \$95,000 cost as attributable to MOL?

- a. If not, was it excluded from the attributable costs of MOL because it was considered "pre-experiment," i.e., part of the operations test phase or the market test phase? Please explain.
 - b. If not, was it excluded from the attributable costs of MOL because it was considered a POL cost, not an MOL cost? Please explain.
 - c. If not, was it excluded from the attributable costs of MOL because it was considered a start-up cost rather than an on-going cost? Please explain.
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- d. If there were any other reasons for not treating the \$95,000 cost as attributable to MOL, please present these in detail.
- e. If the \$95,000 cost was treated as attributable by witness Lim, please give a specific citation to his exhibits (or elsewhere in previously filed materials) where this attribution is presented. Also, provide a reconciliation (or crosswalk) between the \$95,000 figure contained in the Delivery Order with witness Lim's attribution.

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.


Shelley S. Dreifuss
Attorney

Washington, D.C. 20268-0001
February 19, 1999