

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

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Mailing Online Service )

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
(OCA/USPS-62-66)  
March 2 , 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.

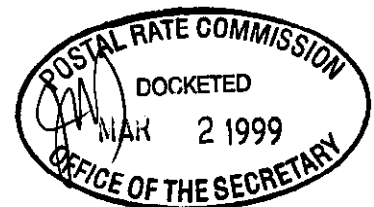
Respectfully submitted,

*Gail Willette*

Gail Willette  
Office of the Consumer Advocate

*Shelley S. Dreifuss*

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Attorney  
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OCA/USPS-62. Please refer to the Response of the Postal Service to Questions Raised During February 5, 1999 Hearing, filed February 22, 1999 [Re Tr. 8/2027]. In particular, refer to the first functional component listed, i.e., POL Web Graphical User Interface (GUI) and General Web Content.

- a. Please give the total costs for functional component 1, "POL Web Graphical User Interface (GUI) and General Web Content."
- b. If the Postal Service is unable to provide precise cost estimates for functional component 1, then provide ballpark estimates of the total costs of functional component 1.
- c. State the source for cost estimates provided in response to parts a. and/or b. above. Provide citations to documentation previously filed (if applicable). Provide copies of all other information relied upon in formulating the cost estimates. If the statements of individuals are the basis for the estimates, then state the employer and position of the person making the statement and report the statements made as accurately as possible.
- d. Please state the proportion of MOL functional component 1 costs to total functional component 1 costs that results from "[u]sing the causation test described at USPS-T-9, page 4." (USPS Response, February 22, 1999, at 2).
- e. Please state the proportion of total functional component 1 costs that is considered "specific to POL that are not allocated to either MOL or SOL." (Response of witness Lim to OCA/USPS-ST-9-3.f.).
- f. If a precise proportion cannot be computed, then give a ballpark estimate of the proportion of POL-specific costs.

- g. State the source for proportion figures given in response to parts e. and/or f. above. Provide citations to documentation previously filed (if applicable). Provide copies of all other information relied upon in formulating the proportion estimates. If the statements of individuals are the basis for the estimates, then state the employer and position of the person making the statement and report the statements made as accurately as possible.
- h. Please state the proportion of total functional component 1 costs that is considered "SOL Specific." (USPS-ST-9 at 3, Diagram 1, Step 2).
- i. If a precise proportion cannot be computed, then give a ballpark estimate of the proportion of SOL-specific costs.
- j. State the source for proportion figures given in response to parts h. and/or i. above. Provide citations to documentation previously filed (if applicable). Provide copies of all other information relied upon in formulating the proportion estimates. If the statements of individuals are the basis for the estimates, then state the employer and position of the person making the statement and report the statements made as accurately as possible.

OCA/USPS-63. Please refer to the Response of the Postal Service to Questions Raised During February 5, 1999 Hearing, filed February 22, 1999 [Re Tr. 8/2027]. In particular, refer to the second functional component listed, i.e., New Registration and Account Maintenance.

- a. Please give the total costs for functional component 2, "New Registration and Account Maintenance."

- b. If the Postal Service is unable to provide precise cost estimates for functional component 2, then provide ballpark estimates of the total costs of functional component 2.
- c. State the source for cost estimates provided in response to parts a. and/or b. above. Provide citations to documentation previously filed (if applicable). Provide copies of all other information relied upon in formulating the cost estimates. If the statements of individuals are the basis for the estimates, then state the employer and position of the person making the statement and report the statements made as accurately as possible.
- d. Please state the proportion of MOL functional component 2 costs to total functional component 2 costs that results from "[a]pplying the causation test." (USPS Response, February 22, 1999, at 3).
- e. Were any of the costs of the following hardware and software components allocated to MOL after application of the causation test:
  - i. POL servers?
  - ii. Database server?
  - iii. Internal switches?
  - iv. Database management system?
  - v. Operating system?
  - vi. Customized registration application?
  - vii. Account maintenance?

Please answer each of subparts i.-vii. separately.

- f. For each of the hardware and software components listed above as subparts i.-vii. of part e.—if the cost was allocated to MOL after application of the causation test, give the specific costs allocated and state exactly where and how those costs were incorporated by witness Lim in his cost estimates. Include citations to his testimony and exhibits.
- g. For each of the hardware and software components listed above as subparts i.-vii. of part e.—if the cost was not allocated to MOL after application of the causation test, give the reasons for the determination that MOL should not bear direct responsibility for the specific hardware or software cost.
- h. Please state the proportion of total functional component 2 costs that is considered "specific to POL that are not allocated to either MOL or SOL."  
(Response of witness Lim to OCA/USPS-ST-9-3.f.).
- i. If a precise proportion cannot be computed, then give a ballpark estimate of the proportion of POL-specific costs.
- j. State the source for answers given in response to parts d., e., g., h. and i. above. Provide citations to documentation previously filed (if applicable). Provide copies of all other information relied upon in preparing the answers. If the statements of individuals are the basis for the answers, then state the employer and position of the person making the statement and report the statements made as accurately as possible.
- k. Are any of the costs of the following hardware and software components considered POL-specific (Response of witness Lim to

OCA/USPS-ST-9-3.f.):

- i. POL servers?
- ii. Database server?
- iii. Internal switches?
- iv. Database management system?
- v. Operating system?
- vi. Customized registration application?
- vii. Account maintenance?

If so, identify each hardware or software component considered POL-specific and state the cost of the component. If any of the seven listed hardware or software components is not considered POL-specific, give the reasons for that determination.

- I. State the source for answers provided in response to part k. above. Provide citations to documentation previously filed (if applicable). Provide copies of all other information relied upon in preparing the answers. If the statements of individuals are the basis for the answers, then state the employer and position of the person making the statement and report the statements made as accurately as possible.
- m. Please state the proportion of total functional component 2 costs that is considered "SOL Specific." (USPS-ST-9 at 3, Diagram 1, Step 2).
- n. If a precise proportion cannot be computed, then give a ballpark estimate of the proportion of SOL-specific costs.

- o. State the source for proportion figures given in response to parts m. and/or n. above. Provide citations to documentation previously filed (if applicable).  
Provide copies of all other information relied upon in formulating the proportion estimates. If the statements of individuals are the basis for the estimates, then state the employer and position of the person making the statement and report the statements made as accurately as possible.

OCA/USPS-64. Please refer to the Response of the Postal Service to Questions Raised During February 5, 1999 Hearing, filed February 22, 1999 [Re Tr. 8/2027]. In particular, refer to the third functional component listed, i.e., Payment Processing and Payment Reporting for Registered Users.

- a. Please give the total costs for functional component 3, "Payment Processing and Payment Reporting for Registered Users."
- b. If the Postal Service is unable to provide precise cost estimates for functional component 3, then provide ballpark estimates of the total costs of functional component 3.
- c. State the source for cost estimates provided in response to parts a. and/or b. above. Provide citations to documentation previously filed (if applicable).  
Provide copies of all other information relied upon in formulating the cost estimates. If the statements of individuals are the basis for the estimates, then state the employer and position of the person making the statement and report the statements made as accurately as possible.

- d. Please state the proportion of MOL functional component 3 costs to total functional component 3 costs that results from applying the causation test.
- e. Were any of the costs of the following hardware and software components allocated to MOL after application of the causation test:
  - i. POL servers?
  - ii. Database server?
  - iii. Internal switches?
  - iv. Routers to the payment-processing site?
  - v. Database?
  - vi. Operating system?
  - vii. Payment processing?
  - viii. Refund application?
  - ix. Reporting application?

Please answer each of subparts i.-ix. separately.

- f. For each of the hardware and software components listed above as subparts i.-ix. of part e.—if the cost was allocated to MOL after application of the causation test, give the specific costs allocated and state exactly where and how those costs were incorporated by witness Lim in his cost estimates. Include citations to his testimony and exhibits.
- g. For each of the hardware and software components listed above as subparts i.-ix. of part e.—if the cost was not allocated to MOL after application of the causation test, give the reasons for the determination that MOL should not bear direct responsibility for the specific hardware or software cost.



- h. State the source for answers given in response to parts d., e. and g. above. Provide citations to documentation previously filed (if applicable). Provide copies of all other information relied upon in preparing the answers. If the statements of individuals are the basis for the answers, then state the employer and position of the person making the statement and report the statements made as accurately as possible.**
- i. Please state the proportion of total functional component 3 costs that is considered "specific to POL that are not allocated to either MOL or SOL." (Response of witness Lim to OCA/USPS-ST-9-3.f.).**
- j. If a precise proportion cannot be computed, then give a ballpark estimate of the proportion of POL-specific costs.**
- k. State the source for proportion figures given in response to parts i. and/or j. above. Provide citations to documentation previously filed (if applicable). Provide copies of all other information relied upon in formulating the proportion estimates. If the statements of individuals are the basis for the estimates, then state the employer and position of the person making the statement and report the statements made as accurately as possible.**
- l. Are any of the costs of the following hardware and software components considered POL-specific (Response of witness Lim to OCA/USPS-ST-9-3.f.):**

  - i. POL servers?**
  - ii. Database server?**

- iii. Internal switches?
- iv. Routers to the payment-processing site?
- v. Database?
- vi. Operating system?
- vii. Payment processing?
- viii. Refund application?
- ix. Reporting application?

If so, identify each hardware or software component considered POL-specific and state the cost of the component. If any of the nine listed hardware or software components is not considered POL-specific, give the reasons for that determination.

- m. State the source for answers provided in response to part l. above. Provide citations to documentation previously filed (if applicable). Provide copies of all other information relied upon in preparing the answers. If the statements of individuals are the basis for the answers, then state the employer and position of the person making the statement and report the statements made as accurately as possible.
- n. Please state the proportion of total functional component 3 costs that is considered "SOL Specific." (USPS-ST-9 at 3, Diagram 1, Step 2).
- o. If a precise proportion cannot be computed, then give a ballpark estimate of the proportion of SOL-specific costs.
- p. State the source for proportion figures given in response to parts n. and/or o. above. Provide citations to documentation previously filed (if applicable).

Provide copies of all other information relied upon in formulating the proportion estimates. If the statements of individuals are the basis for the estimates, then state the employer and position of the person making the statement and report the statements made as accurately as possible.

OCA/USPS-65. Please refer to the Response of the Postal Service to Questions Raised During February 5, 1999 Hearing, filed February 22, 1999 [Re Tr. 8/2027]. In particular, refer to the fourth functional component listed, Reporting for Internal Operations and Management.

- a. Six sub-components are listed. Please give a detailed description of each of the six sub-components. As part of this description, please spell out "DDD" and "Y&R."
- b. Please give the separate costs for each of the six sub-components.
- c. If the Postal Service is unable to provide precise cost estimates, then provide ballpark cost estimates for each of the six sub-components.
- d. Please state the proportion of MOL costs to total for each of the six sub-component costs, after application of the causation test.
- e. State the source for answers given in response to parts b., c., and d. above. Provide citations to documentation previously filed (if applicable). Provide copies of all other information relied upon in preparing the answers. If the statements of individuals are the basis for the answers, then state the employer and position of the person making the statement and report the statements made as accurately as possible.

- f. Please give an estimate of the comparative number and size of reports made to the following recipients: POL program manager, package shipping interfaces, the help desk, web site development team, and "others." (If possible, specify who the "others" are.)
- g. Were any of the costs of the following hardware and software components allocated to MOL after application of the causation test:
- i. POL servers?
  - ii. Internal switches?
  - iii. Database?
  - iv. Operating system?
  - v. Customized reports?
- Please answer each of subparts i.-v. separately.
- h. For each of the hardware and software components listed above as subparts i.-v. of part g.—if the cost was allocated to MOL after application of the causation test, give the specific costs allocated and state exactly where and how those costs were incorporated by witness Lim in his cost estimates. Include citations to his testimony and exhibits.
- i. For each of the hardware and software components listed above as subparts i.-v. of part g.—if the cost was not allocated to MOL after application of the causation test, give the reasons for the determination that MOL should not bear direct responsibility for the specific hardware or software cost.
- j. State the source for answers given in response to parts g., and i. above. Provide citations to documentation previously filed (if applicable). Provide copies of all

- other information relied upon in preparing the answers. If the statements of individuals are the basis for the answers, then state the employer and position of the person making the statement and report the statements made as accurately as possible.
- k. Please state separately the proportions of each of the six sub-component costs that are considered "specific to POL that are not allocated to either MOL or SOL." (Response of witness Lim to OCA/USPS-ST-9-3.f.).
  - l. If precise proportions cannot be computed, then give ballpark estimates of the proportions of each of the six sub-component costs that are considered POL-specific.
  - m. State the source for proportion figures given in response to parts k. and/or l. above. Provide citations to documentation previously filed (if applicable). Provide copies of all other information relied upon in formulating the proportion estimates. If the statements of individuals are the basis for the estimates, then state the employer and position of the person making the statement and report the statements made as accurately as possible.
  - n. Are any of the costs of the following hardware and software components considered POL-specific (Response of witness Lim to OCA/USPS-ST-9-3.f.):
    - i. POL servers?
    - ii. Internal switches?
    - iii. Database?

- iv. Operating system?
- v. Customized reports?

If so, identify each hardware or software component considered POL-specific and state the cost of the component. If any of the five listed hardware or software components is not considered POL-specific, give the reasons for that determination.

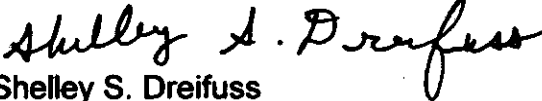
- o. State the source for answers provided in response to part n. above. Provide citations to documentation previously filed (if applicable). Provide copies of all other information relied upon in preparing the answers. If the statements of individuals are the basis for the answers, then state the employer and position of the person making the statement and report the statements made as accurately as possible.
- p. Please state separately the proportion of each of the six sub-component costs that is considered "SOL Specific." (USPS-ST-9 at 3, Diagram 1, Step 2).
- q. If precise proportions cannot be computed, then give ballpark estimates of the proportions of each of the six sub-component costs that are considered SOL-specific.
- r. State the source for proportion figures given in response to parts p. and/or q. above. Provide citations to documentation previously filed (if applicable). Provide copies of all other information relied upon in formulating the proportion estimates. If the statements of individuals are the basis for the estimates, then state the employer and position of the person making the statement and report the statements made as accurately as possible.

OCA/USPS-66. Please refer to the Response of the Postal Service to Questions Raised During February 5, 1999 Hearing, filed February 22, 1999 [Re Tr. 8/2027]. In particular, refer to the fifth functional component listed, POL Help Desk.

- a. Also refer to USPS-ST-9 at 5.
  - i. Of the remaining 80 percent of help desk calls (after 20 percent has been allocated to MOL), what percentage of the calls is POL-specific?
  - ii. And what percentage is SOL-specific?
- b. Show how these percentages were calculated. Cite or provide any underlying data used to make the calculations.

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  
March 2, 1999