

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on Post E.C.S.

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Docket No. C99-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-8-18)
July 6, 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-1-7 to the United States Postal Service, dated June 28, 1999, are hereby incorporated by reference.

Respectfully submitted,

OFFICE OF THE CONSUMER ADVOCATE

Emmett Rand Costich

Ted P. Gerarden
Director

Emmett Rand Costich
Attorney

OCA/USPS-8. Please refer to the web address

http://www.usps.gov/postecs/about_frame.htm

The name PosteCS is followed by the trademarked (™) symbol. Please identify precisely the entity who claims this trademark. Please identify all entities with whom this trademark is registered.

OCA/USPS-9. Please refer to the linked web addresses

<http://www.tumbleweed.com/>

<http://www.news.com/News/Item/0,4,38639,00.html?tag=st.cn.sr1.dir>

Please confirm that Tumbleweed Software Corp is the developer of PosteCS™. If you do not confirm, please identify the developer of PosteCS™. Please describe the relationship between the Postal Service and Tumbleweed Software. Please describe the relationship between the Postal Service and any other developer of PosteCS™. Please describe the relationship between the entity that claims the trademark on PosteCS and Tumbleweed Software.

OCA/USPS-10. Do the Postal Service, Canada Post, LaPoste, and the International Post Corporation have an exclusive arrangement for the use of the software underlying PosteCS? If so, describe that arrangement. If not, please explain. With whom has Tumbleweed Software a contract for development of PosteCS™? Does *that* entity have an exclusive arrangement for the use of the software underlying PosteCS? If so, describe that arrangement. If not, please explain.

OCA/USPS-11. Did the Board of Governors approve the new three-year agreement with Tumbleweed Software Corp (or other PosteCS™ developer)? If not, please describe the participation of the Board in the renewal process and identify the person who approved the renewal on behalf of the Postal Service. If no one approved the renewal on behalf of the Postal Service, please explain why.

OCA/USPS-12. Please provide the location(s) of the <http://global.postecs.com> and <https://global.postecs.com> server(s). Are the <http://> and <https://> servers completely separate computers? Please explain.

OCA/USPS-13. Please describe, separately for the <http://> and <https://> servers, what security measures are in place, who enforces the security measures, and whether the Inspection Service or Inspector General plays any role in PosteCS™ security.

OCA/USPS-14. Who owns and controls the <http://global.postecs.com> and <https://global.postecs.com> server(s)? To whom does the "global" domain belong?

OCA/USPS-15. Please refer to the web address

<http://global.com/>

This is the home page for a company called Global Automation of Palo Alto, California 94303-3912. At

<http://global.com/services.html>

this company states that "Global Automation builds client-server applications for the Internet" Is there any relationship between PosteCS™ and Global Automation? If so, please describe that relationship.

OCA/USPS-16. Please refer to the web address

<http://global.postecs.com/>

The name Electronic Postmark is followed by the trademarked (™) symbol. Please identify precisely the entity who claims this trademark. Please identify all entities with whom this trademark is registered. Please describe the functions and use of the Electronic Postmark™ System, identify who developed the system, and state whether the system is licensed by or to the Postal Service.

OCA/USPS-17. Please refer to the linked web addresses

<http://www.tumbleweed.com/>

<http://www.ups.com/bin/shownews.cgi?19990616docexchg>

The latter web page contains a press release from UPS. That press release states,

"In the year since we launched UPS Document Exchange, we've been paying careful attention to our customers' needs and the evolving requirements of the marketplace," said Dale Hayes, UPS vice president for electronic commerce and technology marketing. "Based on this information, we've worked closely with our technology partner **Tumbleweed Software** to deliver an updated version that places UPS Document Exchange at the forefront of the next generation of electronic commerce."

[Bold typeface added.] When did the Postal Service become aware that Tumbleweed Software was UPS's "technology partner"? What security measures are in place to prevent trade secrets of the Postal Service from inadvertently being revealed to UPS?

OCA/USPS-18. Please describe fully the process by which the Postal Service opens accounts for persons responding to the offer to take a 30-day trial period of PosteCS™ service. Are any applicants rejected for reasons other than the failure to provide a first name, last name, and valid email address? If so, describe the criteria for determining which applications to accept. To date, provide the number of applications submitted and the number of such applications that were given a 30-day trial of PosteCS™ service.

CERTIFICATE OF SERVICE

I hereby certify that, on behalf of the Office of the Consumer Advocate, 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

Washington, D.C. 20268-0001
July 6, 1999