

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.

Docket No. C99-1

**UNITED STATES POSTAL SERVICE
RESPONSE TO OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES OCA/USPS—3(A), 4(A-D), 5, AND 7
(July 12, 1999)**

The United States Postal Service hereby provides responses to the following interrogatories of the Office of the Consumer Advocate filed on June 30, 1999: OCA/USPS-3(a), 4(a-d), 5 and 7, filed on July 12, 1999. In providing these responses, the Postal Service does not intend to waive its position that the Postal Service's Motion to Dismiss this proceeding should have been granted.

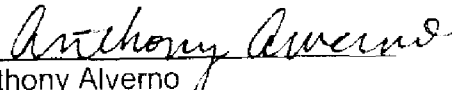
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Chief Counsel, Rate-making


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July 12, 1999

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OCA/USPS-3.

- a) What is signified by “operations test status?”
- b) What will be the new status after the operations test status stage is complete?

RESPONSE:

- a) For purposes of Post E.C.S., this refers to the fact that the Postal Service is examining how the service works and can be improved from an operational perspective, as well as customers' views about it.
- b) Objection filed.

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UPS/USPS-4. Exhibit A to the United Parcel Service Complaint (filed October 6, 1998) consists of a printout of material found at www.posofficeonline.com.

- a) The sixth paragraph of the printout contains the statement: "Post E.C.S. is currently available in market test." Is that statement correct? If so, please reconcile it with the statement contained in question 1, part b, response to Order No. 1229, that the Post E.C.S. is in operations test status.
- b) Explain the distinction between an "operations test" and a "market test," if any.
- c) The first line of the printout states "POST E.C.S. 30-DAY FREE TRIAL." Are Post E.C.S. registrants limited to a 30-day free trial? What happens after the 30-day period has expired?
- d) Have any Post E.C.S. registrants been participants for more than 30 days? If so, how long?
- e) Has the Postal Service charged and/or collected fees from any users of Post E.C.S.? If so, provide a schedule of applicable fees for Post E.C.S. service.
- f) Has the Postal Service developed fees or potential fees for Post E.C.S. service? Provide a copy of all such fees or potential fees.

RESPONSE:

- a) Yes, Post E.C.S. is currently available in test. For purposes of the response to question 1(b) of Order No. 1229, the Postal Service did not intend to convey a different meaning by use of term "market test" in lieu of "operations test."
- b) See response to subpart (a).
- c) Yes; the trial period is thirty days. However, the trial period has been extended in cases in which a customer has not had the chance to access the service or needs more time to coordinate a training session.
- d) Yes. At least one company has been a customer since May 20, 1998.
- e-f) Objection filed.

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OCA/USPS-5. Is the Postal Service still accepting new registrants for Post E.C.S.? Please explain.

RESPONSE:

Yes, the Postal Service is continuing to accept applications for participation in the Post E.C.S. test. Customers can elect to complete an application on the USPS web site.

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OCA/USPS-7. Please refer to the attachment to "Response of United States Postal Service to Order No. 1229 Requesting Supplemental Information," question no. 4

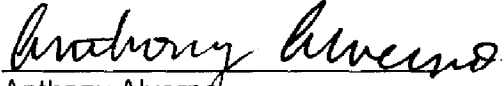
- a) Please explain what "an authorized USPS Post E.C.S. service provider" is.
- b) How is this status differentiated from "hav[ing] a valid account with USPS"?

RESPONSE:

- a) This would be a separate entity authorized by the Postal Service and the technology provider to provide Post E.C.S. At this time, there are no other "authorized USPS Post E.C.S. service provider(s)."
- b) Since there are no authorized USPS Post E.C.S. service providers, this question is not applicable. Any qualified customer desiring to participate in the Post E.C.S. test must have a valid account with the USPS.

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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