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

COMPLAINT ON POST E.C.S.   Docket No. C99-1

UNITED STATES POSTAL SERVICE
RESPONSE TO OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES OCA/USPS—9 (IN PART), 15, 16 (IN PART), 18 (IN PART)
(July 20, 1999)

The United States Postal Service hereby provides responses to the following

interrogatories of the Office of the Consumer Advocate filed on July 6: OCA/USPS—9

(in part), 15, 16 (in part), and 18. Objections to interrogatories OCA/USPS—8, 9 (in

part), 10-14, 16 (in part), 17, 18 (in part) were filed on July 16. 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.
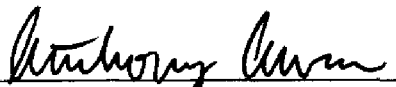
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Anthony Alverno

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2997; Fax —6187
July 20, 1999

OCA/USPS-9. Please refer to the linked web addresses
http://www.tumbleweed.com/
http://www.news.com/News/Item/0,4,38639,00.htm?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.

RESPONSE:

(An objection to all but the third question of this interrogatory has been filed). A

Tumbleweed software product is the software used in PosteCS™. The Postal

Service is a party to a software licensing and service agreement with Tumbleweed

Software, to which International Post Corporation Technology S.C., Canada Post

Corporation, and LaPoste are also parties.

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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.

RESPONSE:

No.

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.

RESPONSE:

A partial objection to this interrogatory has been filed.

The Electronic Postmark™ digital authentication system is an optional feature in Post E.C.S. It combines a time and date seal and tamper detection capabilities. The Electronic Postmark™ system functionality comprises a time-stamped and cryptographically sealed, digital document that accompanies an electronic message to prevent undetected modification of the latter. An Electronic Postmark™ seal for a message contains a time and date generated by the USPS, a footprint of the original message, and other attributes. The entire "item" processed through the Electronic Postmark system is then "sealed" by the addition of a digital signature.

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OCA/USPS-18.   Please describe fully the process by which the Postal Service opens acccounts 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.
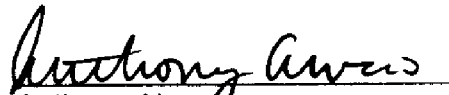
RESPONSE:

A partial objection to this interrogatory has been filed.

Prospective test participants interacting with the Postal Service website complete an application to register for a 30-day evaluation account of PosteCS. Once the request is received via email by the USPS, the Postal Service verifies information submitted on the application. A request that a login id and password be created is then fowarded to the PosteCS system administrator. Once the account is established, an e-mail is sent to the requestor informing the requestor of the login id, password and URL to access the PosteCS service.

The Postal Service has not "rejected" test applicants; however, if all information on the application is not provided, the Postal Service does not process the application until the information is received. In addition, if the Postal Service believes that an applicant's use of Post ECS would not be compatible with system capabilities or is intended for purposes of market research of the product for another entity, the Postal Service would not process an application or discourage the applicant from using the service.

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.

Anthony Alverno

475 L'Enfant Plaza West, S.W.
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