

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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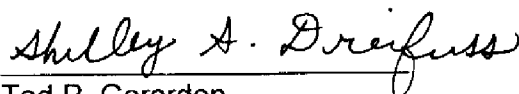
Docket No. C99-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-19-34)
August 25, 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



Ted P. Gerarden
Director

Shelley S. Dreifuss
Attorney

OCA/USPS-19. Please refer to the Attachment to this interrogatory. The Attachment is a printout of information reported by Network Solutions at its "Whois" site. [Note: Network Solutions is "the world's leading provider of Web address registration services Network Solutions is responsible for maintaining the stability and security of the master file of Internet Web addresses." <http://www.netsol.com/nsi/>]

- a. Please confirm that the servers that may be used to provide Post ECS services are "GK-EAST.USPS.GOV" and "GK-WEST.USPS.GOV." If the Postal Service is unable to confirm, explain why not.
- b. In response to interrogatory OCA/USPS-12, the Postal Service stated that: "The Postal Service's server for Post ECS is physically located in the United States, in the State of California." Is the server located in California the same "GK-WEST.USPS.GOV" server listed in the Post ECS domain registration? If not, please explain.
- c. Please confirm that the server "GK-EAST.USPS.GOV" is located in the eastern part of the United States. If the Postal Service is unable to confirm, explain why not.
- d. At the present time, is the "GK-EAST.USPS.GOV" server listed in the Post ECS domain registration involved in the provision of Post ECS? If so, how? If not, why not?
- e. Please confirm that the I.P. addresses for the "GK-EAST.USPS.GOV" and "GK-WEST.USPS.GOV" servers are "56.0.96.11" and "56.0.72.11," respectively. If the Postal Service is unable to confirm, explain why not.

- f. Please confirm that Martineau & Associates is the registrant for the POSTECS domain. If the Postal Service is unable to confirm, explain why not.
- g. Please confirm that Pierre Martineau is the Administrative and Billing contact for the POSTECS domain. If the Postal Service is unable to confirm, explain why not.
- h. What is the relationship between Martineau & Associates and the Postal Service with respect to Post ECS? Please explain in detail.
 - (i). Include in the explanation a description of the duties and services performed by Martineau & Associates in connection with Post ECS.
 - (ii). On what date did Martineau & Associates begin to perform services in connection with Post ECS?
- i. What is the relationship between Pierre Martineau and the Postal Service with respect to Post ECS? Please explain in detail.
 - (i). Include in the explanation a description of the duties and services performed by Pierre Martineau in connection with Post ECS.
 - (ii). On what date did Pierre Martineau begin to perform services in connection with Post ECS.

[ATTACHMENT TO OCA/USPS-19]



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Web Interface to Whois

Brand every e-mail you send.



Registrant:

Martineau & Associates (POSTECS-DOM)
1050 Chestnut Street, #204
Menlo Park, CA 94025
US

Domain Name: POSTECS.COM

Administrative Contact:

Martineau, Pierre (PM39) pierre@MARTINEAU.COM
(415) 326-5030

Technical Contact, Zone Contact:

Stucky, Michael (MS209) stuckym@EAGLE.USPS.GOV
(919) 501-9665 (FAX) (919) 501-9738

Billing Contact:

Martineau, Pierre (PM39) pierre@MARTINEAU.COM
(415) 326-5030

Record last updated on 12-Aug-99.

Record created on 22-Feb-98.

Database last updated on 19-Aug-99 04:22:31 EDT.

Domain servers in listed order:

GK-EAST.USPS.GOV	<u>56.0.96.11</u>
GK-WEST.USPS.GOV	<u>56.0.72.11</u>

Questions? help@networksolutions.com
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OCA/USPS-20. In response to question 2, posed by the Commission in Order No. 1229, the Postal Service stated: "Based on customer feedback and informal interviews with end users, it is known that transactions are originated and directed to recipients within the U.S."

- a. Please break down the information cited above, i.e., customer feedback and informal interviews, into (1) domestic transactions, i.e., those originated in the U.S. and directed to recipients within the U.S., and (2) those which are non-domestic, i.e., either initiation of the communication or receipt of the communication (or both) take place outside the U.S. Express the breakdown as percentages of total Post ECS transactions. The percentages for (1) and (2) should sum to 100 percent. Ballpark percentage estimates are acceptable if more precise information is unavailable.
- b. Has the Postal Service had additional customer feedback and/or informal interviews since the time that the answer to question 2 was filed on March 3, 1999? If so, please answer part a. of this interrogatory based on all feedback and informal interview information, including the most recent feedback and interview information.
- c. Does the Postal Service know "that transactions are originated [or] directed to recipients [outside] the U.S.?" If yes, how did the Postal Service obtain this knowledge?

OCA/USPS-21. Please confirm that Post ECS's Adobe Acrobat portable document format technology "enables recipients to read any document regardless of the software

applications used to create them." (Refer to p. 4 of Attachments to the Postal Service's response to interrogatory UPS/USPS-5A). If the Postal Service is unable to confirm, explain why not.

OCA/USPS-22. In response to interrogatory UPS/USPS-46B-C, the Postal Service states that: "The sender and recipient [of Post ECS] can . . . be located in any combination of locations." Please confirm that one subset of the possible sender/recipient combinations consists of senders and recipients located in the U.S. If the Postal Service is unable to confirm, explain why not.

OCA/USPS-23. Would it be theoretically possible for the Postal Service to add the following (or a similar) question to the screen filled in by a Post ECS registrant at the time that a Post ECS service is purchased?

"Please darken one of the following boxes by clicking your computer mouse.

Is this Post ECS communication being generated by a computer located

in the U.S.? or

outside the U.S.?

(Please call 1-800-xxx-xxxx if you are uncertain about whether your location is 'in the U.S.' or 'outside the U.S.' for the purpose of answering this question.)"

- a. Please give a “yes” or “no” answer to the question posed above, i.e., whether it would be theoretically possible to add such a question (or a similar question) at the time a Post ECS transaction is made. If the answer is “no,” explain in full why it would not be possible for the Postal Service to ask such questions of registrants.
- b. If the answer is “yes,” then give a ballpark estimate of the time that would be required to reprogram the Post ECS software to add such a question. State the assumptions made to generate the ballpark estimate.
- c. Please confirm that Post ECS test participants “agree to participate in market research conducted by the USPS during the course of the test.” Attachment to Postal Service’s response to interrogatory UPS/USPS-11, “*Post E.C.S. Service Test Participant Application.*”
- d. Does the Postal Service agree that having information such as this for each Post ECS transaction could be used to separate domestic transactions from non-domestic transactions? If the answer is negative, please explain in full the basis for disagreement.

OCA/USPS-24. Would it be theoretically possible for the Postal Service to add the following (or similar) questions to the screen filled in by a Post ECS registrant at the time that a Post ECS service is purchased?

- *“Is this Post ECS communication directed to a single recipient? (If not, then skip to the next set of questions).”*

*If so, then choose one of the following (click computer mouse to darken **one** of the 3 boxes below)—*

*The location where the recipient will receive e-mail notification is located **in** the U.S.* , or

*The location where the recipient will receive e-mail notification is located **outside** the U.S.,* or

Recipient's location is not known.

(Please call 1-800-xxx-xxxx if you are uncertain about whether the recipient's location is 'in the U.S.' or 'outside the U.S.' for the purpose of answering this question.)

- *Is this communication directed to multiple recipients? (If not, then answer the set of questions immediately preceding this set).*

If so, then please fill in both of the boxes below (use "0" if appropriate)—

*Number of recipients located **in** the U.S.*

*Number of recipients located **outside** the U.S.*

Number of recipients whose location is unknown.

- Please give a "yes" or "no" answer to the question posed above, i.e., whether it would be theoretically possible for the Postal Service to add such questions (or similar questions) at the time a Post ECS transaction is made. If the answer is "no," explain in full why it would not be possible for the Postal Service to ask such questions of registrants.
- If the answer is "yes," then give a ballpark estimate of the time that would be required to reprogram the Post ECS software to add such questions. State the assumptions made to generate the ballpark estimate.

- c. Does the Postal Service agree that having information such as this for each Post ECS transaction could be used to separate domestic transactions from non-domestic transactions? If the answer is negative, please explain in full the basis for disagreement.

OCA/USPS-25. In response to interrogatory OCA/USPS-12, the Postal Service states that "the 's' appended to the https:// denotes the secure portion of a server." Please explain generally how the secure portion of a server and the non-secure portion of a server differ physically. Please describe generally any other differences between the secure and non-secure portions of a server. Also, describe generally any measures taken to ensure security in only a portion of a server.

OCA/USPS-26. Please refer to the "*Post E.C.S. Test Pricing Guide*" attached to the Postal Service's response to interrogatory UPS/USPS-11. In that Pricing Guide, the Postal Service represents that:

- a. The Electronic Postmark [™] serves as a "Third-party, trusted time and date stamp that can stand as legal evidence." Please provide all Postal Service notes, files, reports, memoranda, documentation, legal research, and all other written materials that support or address this claim. Also, furnish detailed summaries of any oral statements that underlie this claim, and identify the person(s) making such statements. Give specific citations to any federal or state laws supporting the Pricing Guide claim.
- b. The Postal Service also represents that the Electronic Postmark [™] provides "Legal protections against tampering and misrepresentations of fact or identity."

Please provide all Postal Service notes, files, reports, memoranda, documentation, legal research, and all other written materials that support or address this claim. Also, furnish detailed summaries of any oral statements that underlie this claim, and identify the person(s) making such statements. Give specific citations to any federal or state laws supporting the Pricing Guide claim.

OCA/USPS-27. Please refer to the "Post E.C.S. Account Request Information" attached to the Postal Service's response to interrogatory UPS/USPS-11.

- a. Please confirm that the Postal Service asks for the "Physical Address" of every account member.
- b. Does the Postal Service agree that it is reasonable to assume that *almost all* Post ECS account members whose physical address is in the U.S. will initiate their Post ECS communications in the U.S.? If the answer is negative, please explain in full the basis for the answer.
- c. Does the Postal Service agree that it is reasonable to assume that the *majority of* all Post ECS account members whose physical address is in the U.S. will initiate their Post ECS communications in the U.S.? If the answer is negative, please explain in full the basis for the answer.
- d. Does the Postal Service currently have any registrations on file for Post ECS account holders or account members whose physical address is located outside the U.S.? If so, please state the percentage of total account member registrations involving physical addresses located outside the U.S. (Or, conversely, state the percentage of total account member registrations involving

physical addresses located within the U.S.) These two percentage figures should sum to 100 percent.

OCA/USPS-28. Please state the probability that the proportion of domestic Post ECS transactions has been less than the following fractions.

- a. 0.0001
- b. 0.001
- c. 0.01
- d. 0.1
- e. 0.2
- f. 0.3
- g. 0.4
- h. 0.5
- i. 0.9
- j. 0.99
- k. 0.999
- l. 0.9999

OCA/USPS-29. For the fractions listed in OCA/USPS-28, please state the probability that the proportion of domestic Post ECS transactions will be less than the listed fractions in FY 2000.

OCA/USPS-30. If the probabilities requested in the two previous interrogatories (OCA/USPS-28 and OCA/USPS-29) cannot be provided, please state the basis for any belief of the Postal Service that some Post ECS transactions will certainly be

international in character. Please distinguish the basis of the Postal Service's belief from the statement, "If an event **might** happen, then it **will** happen."

OCA/USPS-31. Does the Postal Service allow registration for Post ECS by individuals or businesses located in Canada? Please explain in full.

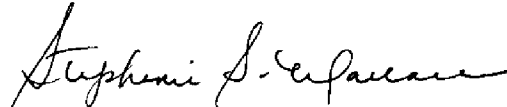
OCA/USPS-32. Does the Postal Service allow registration for Post ECS by individuals or businesses located in France? Please explain in full.

OCA/USPS-33. Canada Post imposes the following limitation on registration: "Any business *within Canada* is eligible for Canada Post's PosteCS™ 30 day free trial offer." (<http://www.canadapost.ca/CPC2/eps/postecs/registry.html>; emphasis added). Does the Postal Service impose a comparable restriction on registration, i.e., that a registrant be located within the U.S.? Please explain in full.

OCA/USPS-34. Please refer to the Postal Service's Attachment in response to UPS/USPS-11, Post E.C.S. Test Pricing Guide. There it states that "Basic Transaction" includes "tracking." Please explain in detail exactly what occurs when USPS "tracks" a transaction. Also, please give a step-by-step narrative of this process.

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.

A handwritten signature in cursive script, appearing to read "Stephanie S. Wallace".

Stephanie Wallace

Washington, D.C. 20268-0001

August 25, 1999