

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

RECEIVED

SEP 9 4 07 PM '99

COMPLAINT ON POST E.C.S.

POSTAL RATE COMMISSION
Docket No. C99-1 OF THE SECRETARY

UNITED STATES POSTAL SERVICE
RESPONSE TO OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES OCA/USPS—20, 22, 25, 27 AND 34
(September 9, 1999)

In accordance with the special rules of practice, the United States Postal Service hereby provides responses to the following interrogatories of the Office of the Consumer Advocate filed on August 25, 1991: OCA/USPS-20(c), 22, 25, 27(a) and 34. Objections to interrogatories OCA/USPS-19, 20(a-b), 21, 23-26, 27(b-d), and 28-33 were filed on September 7, 1999. While not withdrawing its objection to question 25, the Postal Service is providing a response to this follow-up interrogatory in order to clear up a misunderstanding underlying the question. 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.

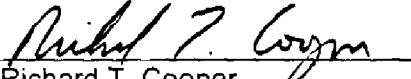
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993; Fax -5402

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

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."

* * * *

(c) Does the Postal Service know "that transactions are originated [or] directed to recipients [outside] the U.S.?"

RESPONSE:

(c) The Postal Service does not monitor the locations of Post_eCS sender/recipient combinations. However, the Postal Service does not contest that Post_eCS transactions have been directed to recipients physically located outside the U.S.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

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.

RESPONSE:

As indicated in the response to interrogatory UPS/USPS-46(b), Post_eCS may be used to send a message or a document from a sender and recipient in any combination of locations, including a sender physically located in the United States and a recipient physically located in the United States.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

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.

RESPONSE (OVER OBJECTION):

The quoted response was an attempt to phrase the answer in layman's terminology.

A more precise explanation is as follows: The use of the "s" appended to "https://" describes use of a browser technology to provide two-way encryption of data sent between a browser on a client PC and a web application server. It is not application-specific. Applications, however, can make use of this technology.

This technology is generally described as "secure socket layer" (SSL) technology, with the use of the term "socket" referring to the programming concept of a virtual channel between the browser and server, and in particular, the connection to each end (browser and server). Data encrypted in this information channel is protected against interception by a third-party, which is the primary protection afforded by SSL technology. This concept of a secure socket layer is useful to explain its security function in relationship to other functions in programming, but does not correspond to any physical layer or area in a server.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

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.

RESPONSE:

(a) Confirmed.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

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.

RESPONSE:

The Post_eCS tracking feature provides information about Post_eCS transactions sent from an account and helps a Post_eCS account holder to identify status information regarding particular deliveries, such as the time the message was sent and the time recipient was notified. The Postal Service itself does not track a transaction. The steps followed by an account holder are as follows:

The account holder launches a web browser, logs into the Post_eCS web site, and clicks on the Tracking button. The following items are available within the Tracking mode:

- Log
- Search
- Preferences
- Help

The account holder may click "Log" to see a record of all deliveries sent from the account, presented in the format specified on the Preferences page. The default format includes the delivery date, the subject, recipient(s), total number of recipients, the total number of recipients who have been notified, and the total number of recipients who have received the document(s).

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

If all deliveries do not fit on one page, one can click on the "Next" button at the bottom of the page. The "Previous" button links to the previous page of deliveries.

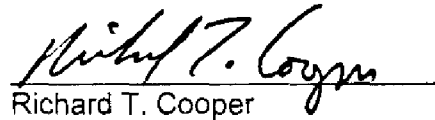
The account holder may then click on the highlighted subject of each listing in the log to open a Delivery Detail report about the specific delivery. A Delivery Detail report contains send parameters of each delivery and the status of the delivery to each recipient. The Delivery Detail report includes the following information:

- **Post_eCS Package** – The Post_eCS Package area summarizes the delivered documents. It includes the package's subject, the number of files sent and their titles, and the delivery date and time. The file titles will link to a view of the actual files if the delivery was sent without security options.
- **Send Options** – The Send Options area lists the options selected for the delivery, including delivery date and time, expiration date and time, priority, confirmation, security and billing code.
- **Delivery Status** – The Delivery Status area summarizes the number of recipients who have been notified, received, and confirmed receipt of the delivered documents.
- **Recipient(s)** – The Recipient(s) area itemizes each recipient and their delivery status for the Post_eCS package. Mail lists are broken out to show each recipient on the mail list.

After viewing a Delivery Detail report, one can click on "Log" to return to the top level Delivery Log.

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.


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993; Fax -5402
September 9, 1999