

Before the  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

Complaint of Capital One Services, Inc.     )

Docket No. C2008-3

PUBLIC REPRESENTATIVE INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE  
(PR/USPS-8-9)  
August 12, 2008

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Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Public Representative hereby submits interrogatories and requests for production of documents. Instructions included with Public Representative interrogatories PR/USPS-1-7 dated August 11, 2008, are hereby incorporated by reference.

Respectfully submitted,

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EMMETT RAND COSTICH  
Public Representative

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PR/USPS-8. In “Decision of the Governors of the United States Postal Service on the Opinion and Recommended Decision of the Postal Regulatory Commission Approving Negotiated Service Agreement with Bank of America Corporation, Docket No. MC2007-1,” at 2, it states

The NSA is intended to encourage BAC to undertake certain activities that would reduce the costs associated with processing BAC’s First-Class Mail and Standard Mail letters by providing BAC with “performance-based” discounts.

Please define and discuss the phrase “performance-based” as used by the Governors with respect to the Bank of America NSA.

PR/USPS-9. In “Decision of the Governors of the United States Postal Service on the Opinion and Recommended Decision of the Postal Regulatory Commission Approving Negotiated Service Agreement with Bank of America Corporation, Docket No. MC2007-1,” at 5, it states

We conclude that the potential benefits of the variety of operational commitments made by BAC provide a convincing reason, despite any estimated reduction in contribution, for proceeding with implementation of the NSA.

- a. Please explain the meaning of the phrase “despite any estimated reduction in contribution” in the statement quoted above.
- b. If the potential benefits associated with the variety of operational commitments made by BAC “provide a convincing reason . . . for proceeding with implementation of the [BAC] NSA,” please explain why the Postal Service should not conclude and implement an NSA with Capital One if Capital One agrees to the same operational commitments as made by BAC, “despite any estimated reduction in contribution.”