

UNITED STATES OF AMERICA  
Before The  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

Rate and Service Changes to Implement )  
Baseline Negotiated Service Agreement )  
With Bank of America Corporation )

Docket No. MC2007-1

OFFICE OF THE CONSUMER ADVOCATE INTERROGATORIES  
TO UNITED STATES POSTAL SERVICE  
WITNESS ALI AYUB  
(OCA/USPS-T1-44-46)  
(March 20, 2007)

Pursuant to Rules 25 through 28 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-T1-1-4, dated February 15, 2007, are hereby incorporated by reference

Respectfully submitted,

Shelley S. Dreifuss, Director  
Office of the Consumer Advocate

Emmett Rand Costich, Attorney

901 New York Avenue, N.W.  
Washington, D.C. 20268-0001  
(202) 789-6833; Fax (202) 789-6891  
e-mail: costicher@prc.gov

OCA/USPS-T1-44. Please refer to your testimony, Appendix A. Also, please refer to the “Decision of the Governors of the United States Postal Service on the Opinion and Recommended Decision of the Postal Regulatory Commission on Changes in Postal Rates and Fees, Docket No. R2006-1,” dated March 19, 2007. Please provide revisions to Appendix A and to prior interrogatory responses to reflect the referenced decision of the Governors, and the costing methodologies recommended by the Commission. In your revised Appendix A and responses, please identify and highlight all changes and provide citations for such changes.

OCA/USPS-T1-45. Please refer to the Postal Service’s request, Attachment F, “Negotiated Service Agreement Between United States Postal Service and Bank of America Corporation,” Section IV.C.3.a. and b., which states:

- a. The Postal Service will determine the total number of letter-rated First-Class Mail mailpieces of Bank of America Mail that are read and accepted during their first pass through Postal Service mail sorting equipment during an applicable quarter.
- b. The Postal Service will divide the number identified in Section IV.C.3.a above by the total number of letter-rated First-Class Mail mailpieces of Bank of America Mail that receive a first pass through Postal Service mail sorting equipment during the same quarter.

Also, please refer to your response to OCA/USPS-T1-5(a), which states:

- (a) The term “accepted” in the context of this NSA refers to the volume of mailpieces that are presented to the Postal Service for mailing for which postage is paid. Data on the volume of mail that is presented and therefore “accepted” by the Postal Service will be recorded and reported using Seamless Acceptance.

The term “read” in the context of this NSA refers to the volume of mailpieces that are accepted by the Postal Service and are processed by the Postal Service’s automated letter mail processing equipment. Mailpieces that cannot be read (i.e., process by the Postal Service’s automated letter mail processing equipment) must be diverted to manual operations for processing.

Please reconcile your response with Attachment F, Section IV.C.3.a. and b.

OCA/USPS-T1-46. Please refer to your testimony, Appendix A, “Input Data,” Page 3, which contains the 2006 Billing Determinants for Standard Mail. Also, please refer to your response to OCA/USPS-T1-12(b).

- a. Please confirm that the ECR letter volume of 2,193,803 was obtained by reducing the reported volume of 3-digit letters by 2,193,803. If you do not confirm, please explain.
- b. Please explain the rationale for reducing the reported volume of 3-digit letters by 2,193,803.