

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Rate and Service Changes to Implement )  
Baseline Negotiated Service Agreement ) Docket No. MC2007-1  
With Bank of America Corporation )

**ANSWER OF BANK OF AMERICA CORP. TO  
APWU INTERROGATORIES APWU/BAC-T1-1-3  
(REDIRECTED FROM BAC WITNESS RICHARD D. JONES)**

Bank of America Corporation ("BAC") submits the following institutional answers to American Postal Workers Union, AFL-CIO, interrogatories APWU/BAC-T1-1 through 3 (redirected from BAC witness Richard D. Jones). BAC will provide a witness at the hearing to defend the answers if APWU or any other participant wishes to undertake cross-examination concerning them.

Respectfully submitted,

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May 23, 2007

DOCKET NO. MC2007-1  
ANSWER OF BANK OF AMERICA CORP. TO APWU INTERROGATORY  
(REDIRECTED FROM BAC WITNESS RICHARD JONES)  
May 23, 2007  
PAGE 1

**APWU/BAC-T1-1.** In your response to OCA/BAC-T1-5, you indicated that the 2006 volume data requested were not yet available.

- (a) Are those data now available to be submitted to the record?
- (b) For each class of mail listed, please indicate what percentage was mailed by Bank of America directly and what percentage was mailed by its vendors.
- (c) If the data are not yet available, do you have an estimate as to when those data will be available?

**RESPONSE:**

- (a) No.
- (b) Data not yet available for 2006.
- (c) In the next two weeks.

DOCKET NO. MC2007-1  
ANSWER OF BANK OF AMERICA CORP. TO APWU INTERROGATORY  
(REDIRECTED FROM BAC WITNESS RICHARD JONES)  
May 23, 2007  
PAGE 1

**APWU/BAC-T1-2.** In Mr. Ayub's response to OCA/USPS-T1-35, he references the large volume service bureaus that prepare some of BAC's mail.

(a) Do any of the BAC service bureaus (or BAC itself) participate in any of the USPS's Mailpiece Quality Control Programs? If so, what percentage of BAC's mail is produced under those programs?

(b) Are any of the BAC service bureaus certified under MPTQM?

(c) Have any of the service bureaus personnel (or BAC's personnel) trained in the Postal Service MERLIN training programs?

**RESPONSE:**

(a) BAC does not itself participate. It is quite possible that one or more service bureaus or other third-party vendors used by BAC may participate, but BAC does not know which, if any, actually do so.

(b) BAC believes that at least one letter shop participates in MPTQM, but does not recall its name (the vendor's participation was asserted at meeting of bank suppliers). It is quite possible that one or more service bureaus or other third-party vendors used by BAC may participate, but BAC does not know which, if any, actually do so.

(c) BAC's personnel have not received MERLIN training. It is quite possible that one or more service bureaus or other third-party vendors used by BAC may have received such training, but BAC does not know which, if any, actually have done so.

DOCKET NO. MC2007-1  
ANSWER OF BANK OF AMERICA CORP. TO APWU INTERROGATORY  
(REDIRECTED FROM BAC WITNESS RICHARD JONES)  
May 23, 2007  
PAGE 1

**APWU/BAC-T1-3.** Mr. Ayub's response to VP/USPS-T1-26(c) indicates a direct correlation between Merlin accept rates and the read rates of automation mail.

(a) Have any of BAC's mailings (regardless of who prepared them) failed MERLIN?

(b) What types of scores have BAC's mailings received on MERLIN during the past year?

**RESPONSE:**

(a) The BAC employees most likely to receive notice of such failure are unaware of any such instance in recent years. It is possible, however, that mailings containing BAC mail have failed MERLIN without BAC's knowledge. The majority of the bank's mail is produced by its suppliers. BAC's suppliers are not contractually obligated to inform BAC if the mailings they enter receive failing MERLIN scores. Moreover, third-party vendors would not be able to provide BAC-specific MERLIN scores for mail that is entered as part of a co-mailing. For the majority of the mail produced internally, the POSTNET barcode is applied by the third-party presort supplier. BAC does not have on-site mail acceptance at any location.

(b) As explained in response to part (a), the bank does not know the MERLIN scores of its mail.