

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-T1-34-40)  
(March 9, 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,

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OCA/USPS-T1-34. Please refer to your testimony at page 18, lines 18-20, which identify the baseline return rate of 0.7 percent and 2.7 percent for the First-Class operational and marketing mail, respectively, entered by Bank of America Corporation (BAC). Also, refer to page 15, lines 11-13, which concerns Postal Service verification of the reasonableness of the return and forward rates for Bank of America Corporation's First-Class Mail. Please explain the processes used by the Postal Service to independently verify the reasonableness of the baseline return rate of 0.7 percent and 2.7 percent for BAC's Schedule A and Schedule B First-Class Mail, respectively.

OCA/USPS-T1-35. Please refer to your testimony at page 16, lines 8-9, and page 21, lines 1-2, which reference the baseline value read/accept rates for First-Class Mail and Standard Mail letters, respectively. Please provide any information available to the Postal Service on improvements in the read/accept rates for First-Class Mail and Standard Mail letters since FY 2000, such as engineering or economic studies, reports or presentations provided to the GAO, USPS Inspector General, mailers, or Board of Governors, etc.

OCA/USPS-T1-36. Please refer to your testimony at page 16, lines 8-9, and page 21, lines 1-2, which reference the baseline value read/accept rates for First-Class Mail and Standard Mail letters, respectively.

- a. Please confirm that the referenced baseline value read/accept rates for First-Class Mail and Standard Mail letters are based upon barcodes other than the Four-State barcode. If you do not confirm, please explain.

- b. Please confirm that the Postal Service has available to it read/accept rates from tests of mailpieces displaying the Four-State barcode conducted by the Postal Service or vendors of mail processing equipment. If you do not confirm, please explain. If you do confirm, please provide the results of all such tests.

OCA/USPS-T1-37. Please refer to your testimony at page 16, lines 8-9, and page 21, lines 1-2, which reference the baseline value read/accept rates for First-Class Mail and Standard Mail letters, respectively.

- a. Please confirm that the Postal Service's letter mail processing equipment is currently able to read Four-State barcodes. If you do not confirm, please explain when such equipment will be able to read Four-State barcodes.
- b. What modifications has the Postal Service made to letter mail processing equipment to permit such equipment to read Four-State barcodes? Please identify and discuss all such hardware, software or other modifications, and identify the mail processing equipment to which such modifications have been made.
- c. What effect have the modifications to permit letter mail processing equipment to read Four-State barcodes had on the read/accept rates of First-Class Mail and Standard Mail letters? Please explain

OCA/USPS-T1-38. Please refer to the request, Attachment F, the "Negotiated Service Agreement Between United States Postal Service and Bank of America Corporation," Section II. J., "DPV Report."

- a. Please confirm that BAC will be required to check the address list of all its First-Class Mail and Standard Mail mailings against a Delivery Point Validation (DPV) database. If you do not confirm, please explain.
- b. Please explain how and to what extent checking the address list of a mailing against a DPV database improves the read and accept rate of mailpieces in such a mailing.

OCA/USPS-T1-39. Please refer to the request, Attachment F, the “Negotiated Service Agreement Between United States Postal Service and Bank of America Corporation,” Section II. K., “EDL (or “Enhanced Distribution Label”),” and Section III. E., “Seamless Acceptance.”

- a. Is Seamless Acceptance currently a requirement for bulk letter-rated First-Class Mail and Standard Mail? If not, what are the Postal Service plans for making Seamless Acceptance a requirement for all bulk letter-rated First-Class Mail and Standard Mail? Please explain.
- b. Please explain whether or not use of Seamless Acceptance by BAC will permit the Postal Service to track BAC’s letter-rated First-Class Mail and Standard Mail from the point of entry with the Postal Service to customer delivery. More specifically, will the Postal Service be able to track the location of each piece of BAC’s letter-rated First-Class Mail and Standard Mail that is entered in a tray (or other container), the location of the tray in a pallet (or other container), and the location of the pallet on a truck (or other form of transportation)? Please explain.

- c. Please explain and discuss the relationship (if any) between the Surface Visibility program/system and Seamless Acceptance.
- d. The Enhanced Distribution Label (EDL) is described as a “24-digit barcode label for trays and sacks.” Please discuss whether the Postal Service is currently able to read EDLs on trays and sacks. Please explain and discuss whether or not the Postal Service plans to extend the use of EDLs to containers other than trays and sacks. If so, please identify the other containers to which EDLs will be applied, and any timelines for the use of EDLs on each type of container.

OCA/USPS-T1-40. Please refer to the request, Attachment F, the “Negotiated Service Agreement Between United States Postal Service and Bank of America Corporation,” Section II. Y., “PostalOne!” Please explain whether or not PostalOne! will permit the Postal Service to know the number of BAC’s letter-rated First-Class Mail and Standard Mail pieces in each tray (or other container), the number of trays on each pallet (or other container), and the number of pallets on each truck (or other form of transportation).