

**BEFORE THE
POSTAL RATE 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

**AMERICAN POSTAL WORKERS UNION, AFL-CIO FOLLOW-UP
INTERROGATORIES OF BANK OF AMERICA WITNESS JONES
(APWU/BAC-T1-1-3)
(May 8, 2007)**

Pursuant to Sections 25, 26 and 27 of the Rules of Practice, the American Postal Workers Union, AFL-CIO (APWU) directs the following follow-up interrogatories to Bank of America witness Richard D. Jones. If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

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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?

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' 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?

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?