

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

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS AYUB TO INTERROGATORY OF THE OFFICE OF CONSUMER
ADVOCATE (OCA/USPS-T1-48)
(May 15, 2007)**

The United States Postal Service hereby provides the response of witness Ayub to the following interrogatory of the Office of Consumer Advocate: OCA/USPS-T1-48, filed on May 1, 2007. The interrogatory is stated verbatim and is followed by the response. The Postal Service filed an objection to OCA/USPS-T1-48(b) on May 11, 2007.

UNITED STATES POSTAL SERVICE

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INTERROGATORY OF THE OFFICE OF CONSUMER ADVOCATE**

OCA/USPS-T1-48. Please refer to your response to interrogatory OCA/USPS-T1-35.

- a. Please provide copies of all documents that contain or discuss possible or actual reasons for the variations in scan rates (among individual mailings) shown in the Excel attachment to the response. If no such documents exist, please provide an explanation for these variations in scan rates.
- b. Please provide copies of the documents or files containing the data used to calculate the scan rates for individual mailings.
- c. Please provide the basis for the statement,

High profile pilot studies of this kind are often viewed by the participants as a chance to showcase both the new technology and the skill of the study participants at mastering it. For this reason, participants in studies of this kind often devote more resources to maintenance, alignment, cleaning and calibration than might be expected with a mature technology used in the ordinary course of business. Needless to say, special efforts of this kind can hardly be regarded as good proxies for Before Rates performance in an NSA.

- d. Does (will) BAC use either Mailer A or Mailer B to prepare its mailings?

RESPONSE:

- a. It is my understanding that there are no responsive documents because the Postal Service has not attempted to analyze the underlying data to determine the reasons for the variations in scan rates shown in the Excel attachment to the Postal Service's response to OCA/USPS-T1-35. Variations in scan rates can be caused by (i) differences in mail preparation or mailer performance, or (ii) variations in the performance of the Postal Service's scanning equipment. Please see my responses to OCA/USPS-T1-27 and OCA/USPS-T1-28 which discuss factors that may cause variations in scan rates.
- b. The Postal Service filed an objection to this part of the interrogatory on May 11, 2007. See Objection of the United States Postal Service to Interrogatory OCA/USPS-T1-48(b).
- c. In the test environment, mailers are able to allocate additional resources and can focus on issues that may cause discrepancies in the mail preparation process

that the mailers may otherwise not be able to address during the normal course of operations. Furthermore, mailers in this test environment are attempting to justify investments in new technology and have more flexibility in dealing with obstacles.

- d. At the time the NSA contract was signed, BAC was not using either provider. I do not have any information regarding whether BAC will use these vendors in the future.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

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