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BEFORE THE POSTAL RATE COMMISSION Washington, D.C. 20268-0001 POSTAL CALLS - CALLS OFFICE OF SHE SCIENCE SHE

Experimental Rate and Service Changes To Implement Negotiated Agreement With Capital One Services, Inc.

Docket No. MC2002-2 Service

AMERICAN BANKERS ASSOCIATION INTERROGATORY AND REQUEST FOR PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL WITNESS ANITA J. BIZZOTTO (USPS T1) ABA/USPS (T1-1)

(October 15, 2002)

Pursuant to Sections 25 and 26 of the Rules of Practice of the Postal Rate

Commission, the American Bankers Association hereby submits this interrogatory and

request for production of documents. If the witness to whom an interrogatory is

directed is unable to answer the interrogatory or produce the requested documents and

another person is able to do so, the interrogatory or request should be referred to such

person.

ABA /USPS-T-1-1. In section IV of your testimony, starting at page 3, line 19,

you discuss "Customer-Specific Agreements:"

a) Your discussion of this issue indicates that this is the first of many rate and classification change requests, denominated as negotiated service

agreements (NSA) and based on negotiations with specific customers, which the Postal Service expects to submit to the Postal Rate Commission. Is this understanding correct?

b) This request is for experimental rate and classification changes. If experimental rate and classification changes based on an NSA are considered to be successful and the Postal Service submits a request to make the changes permanent, does the Postal Service intend to request that the permanent rate and classification changes be limited to one customer, or that the permanent rates and classifications be made available to all customers who qualify?

Respectfully submitted,

Irving D. Warden Associate General Counsel American Bankers Association 1120 Connecticut Avenue, N.W. Washington, D.C. 20036 (202) 663-5027 fax (202) 828-4548 Email iwarden@aba.com

CERTIFICATE OF SERVICE

I hereby certify that I have this date caused the foregoing document to be served

upon all participants of record in this proceeding in accordance with Section 12 of the

Rules of Practice.

Irving D. Warden

October 15, 2002