

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Rate and Service Changes to Implement)
Functionally Equivalent Negotiated Service)
Agreement with Bank One Corporation)

Docket No. MC2004-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO BANK ONE CORPORATION
WITNESS BRAD RAPPAPORT (OCA/BOC-T1-11-16)
July 7, 2004

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/BOC-T1-1-10, dated June 28, 2004, are hereby incorporated by reference.

Respectfully submitted,

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OCA/BOC-T1-11 Please refer to your testimony at page 9, lines 8-14.

- (a) Please confirm that J.P. Morgan Chase has completed its purchase of Bank One Corp. If you do not confirm, please explain.
- (b) Please provide the effective date of the purchase of Bank One Corp. by J.P. Morgan Chase.

OCA/BOC-T1-12. Please refer to your testimony at page 9, lines 8-14.

- (a) Please confirm that J.P. Morgan Chase issues credit cards and offers checking account services. If you do not confirm, please explain.
- (b) Please confirm that the credit card and checking accounts of J.P. Morgan Chase will generate eligible First-Class customer account mail and solicitation mail, as described in 612.1 of Attachment A to the Postal Service's Request containing proposed DMCS language implementing the Bank One NSA. If you do not confirm, please explain.

OCA/BOC-T1-13. Please refer to your testimony at page 9, lines 8-14.

- (a) Please provide the following information with respect to the credit card and checking accounts of J.P. Morgan Chase:
 - (i) The number of credit card accounts;
 - (ii) The number of retail customer accounts;
- (b) Please provide for J.P. Morgan Chase a description and the volumes of First-Class Mail for the following:
 - (i) credit card accounts;

- (ii) credit card solicitations;
- (iii) retail financial service accounts;
- (iv) retail financial service solicitations; and,
- (v) any other use of First-Class Mail related to credit and banking products and services, except mail paid for at the single-piece rate.

OCA/BOC-T1-14. Please refer to your testimony at page 9, lines 8-14. What is the new first-year Discount Threshold for the merged J.P. Morgan Chase - Bank One entity? Please explain.

OCA/BOC-T1-15. Please refer to Attachment F of the Request, which contains the NSA between the Postal Service and Bank One, Article IV. A. and B. Please discuss whether the by J.P. Morgan Chase qualifies under Paragraph A. or Paragraph B. of Article IV.

OCA/BOC-T1-16. Please refer to Attachment F of the Request, which contains the NSA between the Postal Service and Bank One, Article VII. Please confirm that Bank One has assigned its rights and responsibilities under the NSA to J.P. Morgan Chase. If you do not confirm, please explain.