

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 UNITED STATES POSTAL SERVICE  
WITNESS MICHAEL K. PLUNKETT (OCA/USPS-T1-12-16)  
July 9, 2004

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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/USPS-T1-12. Please refer to 612.31 of Attachment A to the Request containing proposed DMCS language implementing the Bank One NSA. Since the J.P. Morgan Chase - Bank One merger is complete, please provide the first-year Discount Threshold for the J.P. Morgan Chase - Bank One merged entity.

OCA/USPS-T1-13. Please refer to Attachment B to the Request, and Rate Schedule 612A and Rate Schedule 612B.

- (a) Since the J.P. Morgan Chase - Bank One merger is complete, please provide Rate Schedule 612A for the J.P. Morgan Chase - Bank One merged entity.
- (b) Since the J.P. Morgan Chase - Bank One merger is complete, please provide Rate Schedule 612B for the J.P. Morgan Chase - Bank One merged entity.

OCA/USPS-T1-14. Please refer to 612.34(a) and (b) of Attachment A to the Request containing proposed DMCS language implementing the Bank One NSA. Since the J.P. Morgan Chase - Bank One merger is complete, please confirm that under 612.34(a) and (b), the size of the incremental volume blocks in Rate Schedule 612B will be the same size as Rate Schedule 612A, i.e., 25 million (minus 1), 25 million (minus 1), 25 million (minus 1), 35 million (minus 1), and 35 million (minus 1). If you do not confirm, please explain.

OCA/USPS-T1-15. Please refer to your testimony at page 8, lines 13-15, and the Commission's opinion in Docket No. MC2002-2, at pages 71-73.

- (a) Please confirm that the Postal Service has developed an analysis of the type described in the Commission's opinion with respect to Bank One. If you do confirm, please provide the analysis. If you do not confirm, please explain.
- (b) Please explain how, in the absence of an analysis referred to in part (a) above, the Postal Service has avoided the "design defects" described in the Commission's opinion with respect to the declining block rates applicable to Bank One under the NSA.

OCA/USPS-T1-16. Please refer to Appendix A of your testimony. Since the J.P. Morgan Chase - Bank One merger is complete, please provide your Appendix A for the J.P. Morgan Chase - Bank One merged entity.