

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

Rate and Service Changes To Implement )  
Functionally Equivalent Negotiated Service ) Docket No. MC2004-3  
Agreement with Bank One Corporation )

**RESPONSES OF BANK ONE CORPORATION TO  
OFFICE OF CONSUMER ADVOCATE INTERROGATORIES  
OCA/BOC-T1-1(b) and -7  
(July 12, 2004)**

Bank One Corporation (Bank One) hereby provides the responses of witness Rappaport to Office of Consumer Advocate interrogatories OCA/BOC-T1-1(b) and -7, filed June 28, 2004. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

/s/

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July 12, 2004

RESPONSE OF BANK ONE CORPORATION WITNESS RAPPAPORT  
TO OCA INTERROGATORY OCA/BOC-T1-1(b)

**OCA/BOC-T1-1.** In your testimony at pages 5 through 8 you provide forecasts for three years of First-Class Mail volume and information for three years of historical volumes. The following data are requested in order to examine mailing trends as related to actual and forecasted volumes over an extended period of macroeconomic variability.

- (a) For First-Class Mail, please provide Solicitation (Letters and Flats) and Customer mail volumes on a monthly basis from December 1995 through the present.
- (b) Please provide Standard Mail volumes for mail used for customer solicitation on a monthly basis from December 1995 through the present.
- (c) If the data requested above are not available, please explain why not.

**Response to OCA/BOC-T1-1(b):**

(b) Attachment OCA-BOC-T1-1(b) sets forth the requested Standard Mail volumes by month for 2002, 2003, and 2004. These are based on Bank One's internal records. However, Bank One did not maintain Standard Mail volumes by month for 2000 or 2001. The attachment thus provides Standard Mail volumes on an annual basis for those two years.

**Attachment OCA-BOC-T1-1(b)**  
(data in millions)

<b>Month/Year</b>	<b>Standard Mail Solicitations</b>
2000	482.0
2001	967.0
Jan-02	75.2
Feb-02	93.9
Mar-02	77.1
Apr-02	93.9
May-02	91.7
Jun-02	151.2
Jul-02	119.4
Aug-02	152.9
Sep-02	86.6
Oct-02	117.3
Nov-02	81.9
Dec-02	119.7
Jan-03	59.5
Feb-03	76.1
Mar-03	65.7
Apr-03	66.5
May-03	32.8
Jun-03	72.8
Jul-03	31.0
Aug-03	86.0
Sep-03	71.1
Oct-03	124.9
Nov-03	68.9
Dec-03	68.8
Jan-04	46.0
Feb-04	129.4
Mar-04	59.6
Apr-04	162.8
May-04	106.8

RESPONSE OF BANK ONE CORPORATION WITNESS RAPPAPORT  
TO OCA INTERROGATORY OCA/BOC-T1-7

**OCA/BOC-T1-7.** Did Bank One provide information to the Postal Service that would allow the Postal Service to confirm the accuracy of the customer mail and solicitation mail volume figures set forth in your testimony at page 4, line 14, through page 5, line 1? If so, please describe the information provided by Bank One to the Postal Service.

**Response to OCA/BOC-T1-7:**

The volume figures came from the Postal Service itself. Bank One provided the Postal Service with its records of permit numbers, which the Postal Service used to determine the historical volumes in Table 1 of my testimony.

**Certificate of Service**

I hereby certify that I have today caused the foregoing document to be served in accordance with Section 12 of the Commission's Rules of Practice

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Joy M. Leong

July 12, 2004