

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 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(a) and (c)
(July 14, 2004)**

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

Respectfully submitted,

/s/

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July 14, 2004

**RESPONSE OF BANK ONE WITNESS RAPPAPORT
TO OCA INTERROGATORY OCA/BOC-T1-1(a) and (c)**

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:

(a) The historical volumes for First-Class Mail contained in my testimony at pages 4-5 were derived from Postal Service records of mail volumes based on permit numbers. I provided the Postal Service with the Bank One permit numbers for 2000-2003, and the Postal Service obtained the First-Class Mail volumes from their records. Because the Postal Service maintains records for this time period on an accounting period basis, not a monthly basis, the table attached to this answer (Attachment OCA/BOC-T1-1(a)) provides the requested volumes by accounting period, rather than by month. Note that the years in Table 1 of my testimony run from Postal Quarter 2 through Postal Quarter 1 (approximately December through November) for consistency with Postal Service data systems. Before 2000, Bank One did not record distinct permit numbers, which would have allowed tracking of First-Class Mail volumes.

(c) As explained above, Bank One did not keep complete records of either volume data or permit tracking numbers before 2000. In addition, not all information is available on a monthly basis.

Attachment OCA/BOC-T1-1(a)

(data in millions)

(detail may not add to totals in other tables given independent rounding)

Postal Fiscal Year	Accounting Period/Month	Start Date	End Date	Customer Mail	Solicitations		
					Total	Flats	Letters
2000	AP 4	December 4, 1999	December 31, 1999	33.5	4.3	4.1	0.2
2000	AP 5	January 1, 2000	January 28, 2000	32.7	5.6	3.9	1.7
2000	AP 6	January 29, 2000	February 25, 2000	32.4	5.3	3.9	1.4
2000	AP 7	February 26, 2000	March 24, 2000	33.5	4.9	4.0	0.9
2000	AP 8	March 25, 2000	April 21, 2000	32.0	6.4	4.1	2.3
2000	AP 9	April 22, 2000	May 19, 2000	34.6	4.7	3.1	1.6
2000	AP 10	May 20, 2000	June 16, 2000	36.5	6.0	2.0	4.0
2000	AP 11	June 17, 2000	July 14, 2000	35.2	14.9	2.5	12.4
2000	AP 12	July 15, 2000	August 11, 2000	35.5	4.7	2.3	2.3
2000	AP 13	August 12, 2000	September 8, 2000	39.3	15.1	3.0	12.1
2001	AP 1	September 9, 2000	October 6, 2000	37.0	6.0	2.9	3.1
2001	AP 2	October 7, 2000	November 3, 2000	37.1	7.3	2.5	4.7
2001	AP 3	November 4, 2000	December 1, 2000	32.6	9.3	-	9.3
2001	AP 4	December 2, 2000	December 29, 2000	40.0	8.2	-	8.2
2001	AP 5	December 30, 2000	January 26, 2001	35.2	13.2	-	13.2
2001	AP 6	January 27, 2001	February 23, 2001	36.5	8.2	-	8.2
2001	AP 7	February 24, 2001	March 23, 2001	35.5	7.4	-	7.4
2001	AP 8	March 24, 2001	April 20, 2001	34.8	8.1	-	8.1
2001	AP 9	April 21, 2001	May 18, 2001	37.0	13.3	0.2	13.1
2001	AP 10	May 19, 2001	June 15, 2001	39.3	8.0	3.2	4.8
2001	AP 11	June 16, 2001	July 13, 2001	36.7	5.1	1.2	4.0
2001	AP 12	July 14, 2001	August 10, 2001	38.6	4.5	2.9	1.6
2001	AP 13	August 11, 2001	September 7, 2001	42.3	5.0	4.7	0.2
2002	AP 1	September 8, 2001	October 5, 2001	34.1	8.9	4.6	4.3
2002	AP 2	October 6, 2001	November 2, 2001	37.3	8.5	4.6	3.9
2002	AP 3	November 3, 2001	November 30, 2001	31.9	5.4	3.2	2.2
2002	AP 4	December 1, 2001	December 28, 2001	43.7	8.8	4.8	4.0
2002	AP 5	December 29, 2001	January 25, 2002	39.2	7.3	5.1	2.2
2002	AP 6	January 26, 2002	February 22, 2002	40.5	5.1	4.6	0.5
2002	AP 7	February 23, 2002	March 22, 2002	40.9	4.7	4.1	0.6
2002	AP 8	March 23, 2002	April 19, 2002	39.8	8.9	4.8	4.1
2002	AP 9	April 20, 2002	May 17, 2002	38.9	8.3	3.7	4.6
2002	AP 10	May 18, 2002	June 14, 2002	38.8	5.8	5.0	0.8
2002	AP 11	June 15, 2002	July 12, 2002	38.9	14.5	7.3	7.2
2002	AP 12	July 13, 2002	August 9, 2002	38.4	5.5	4.2	1.3
2002	AP 13	August 10, 2002	September 6, 2002	41.4	14.7	3.7	11.0
2003	AP 1	September 7, 2002	October 4, 2002	34.8	2.2	2.0	0.1
2003	AP 2	October 5, 2002	November 1, 2002	36.4	2.5	0.3	2.2
2003	AP 3	November 2, 2002	November 29, 2002	36.6	3.5	3.2	0.3
2003	AP 4	November 30, 2002	December 27, 2002	43.3	8.2	1.8	6.4
2003	AP 5	December 28, 2002	January 24, 2003	36.8	5.5	2.8	2.7
2003	AP 6	January 25, 2003	February 21, 2003	36.4	8.7	1.5	7.2
2003	AP 7	February 22, 2003	March 21, 2003	41.8	8.8	3.3	5.6
2003	AP 8	March 22, 2003	April 18, 2003	39.6	7.5	3.7	3.8
2003	AP 9	April 19, 2003	May 16, 2003	39.2	10.3	3.7	6.6
2003	AP 10	May 17, 2003	June 13, 2003	39.3	4.9	3.6	1.4
2003	AP 11	June 14, 2003	July 11, 2003	36.8	4.5	4.0	0.5
2003	AP 12	July 12, 2003	August 8, 2003	38.1	8.9	2.5	6.3
2003	AP 13	August 9, 2003	September 5, 2003	41.5	6.7	2.5	4.2
2004		September 6, 2003	September 30, 2003	37.6	6.9	2.1	4.7
2004	Oct-03	October 1, 2003	October 31, 2003	36.5	5.9	2.2	3.7
2004	Nov-03	November 1, 2003	November 30, 2003	33.6	8.7	2.1	6.6

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

/s/

Joy M. Leong

July 14, 2004