

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)

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO BANK ONE CORPORATION
WITNESS BRAD RAPPAPORT (OCA/BOC-T1-17-19)
July 28, 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-T1-17. Please refer to your testimony at page 9, lines 8-14.

- (a) For Bank One, please provide the physical return rate for Standard Mail marketing letter mail.
- (b) For Bank One, please provide the physical return rate for Standard Mail marketing flat mail.
- (c) For J.P. Morgan Chase (JPMC), please provide the physical return rate for First-Class operational/statement letter mail.
- (d) For JPMC, please provide the physical return rate for (i) First-Class marketing letter mail, and (ii) Standard Mail marketing letter mail.
- (e) For JPMC, please provide the physical return rate for (i) First-Class marketing flat mail, and (ii) Standard Mail marketing flat letter mail.
- (f) For the Bank One - JPMC merged entity, please provide the weighted average physical return rate for First-Class operational/statement letter mail.
- (g) For the Bank One - JPMC merged entity, please provide the weighted average physical return rate for (i) First-Class marketing letter mail, and (ii) Standard Mail marketing letter mail.
- (h) For the Bank One - JPMC merged entity, please provide the weighted average physical return rate for (i) First-Class marketing flat mail, and (ii) Standard Mail marketing flat letter mail.

OCA/BOC-T1-18. Please refer to your response to OCA/BOC-T1-1(b). Please provide the Standard Mail solicitation volumes separately for letters and flats for the same time period.

OCA/BOC-T1-19. Please refer to your response to OCA/BOC-T1-1(a).

- (a) For JPMC, please provide the First-Class customer mail and the First-Class solicitation (letters and flats, separately) mail volumes on a monthly basis from December 1995 through the present.
- (b) For JPMC, please provide the Standard Mail solicitation (letters and flats, separately) mail volume on a monthly basis from December 1995 through the present.