

**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

**INTERROGATORIES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO BANK ONE WITNESS BRAD RAPPAPORT
(APWU/BOC-T1-1-3)**

(August 4, 2004)

Pursuant to Sections 25 and 26 of the Rules of Practice, The American Postal Workers Union, AFL-CIO (APWU) directs the following interrogatories to Bank One Corporation witness Brad Rappaport. If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

/s/

Arthur M. Luby

Counsel for

American Postal Workers Union, AFL-CIO

O'Donnell, Schwartz & Anderson, P.C.
1300 L Street NW Suite 1200
Washington, DC 20005-4126
Voice: (202) 898-1707
Fax: (202) 682-9276
E-mail: ALuby@odsalaw.com

APWU/BOC-T1-1

Appendix A, page 11 of USPS-T-1 shows that a substantial part of the ACS savings is due to the flat shaped marketing mail. What factors determine the use of flat shaped marketing mail instead of letter shaped marketing mail? BOC-T1-1 Tables 1-4 indicate that you anticipate that the before rates volume of flat marketing pieces will be about 2 percent below the 2003 volume compared to a 30 percent decline between 2002 and 2003. What factors did you consider in forecasting the relatively small decline for 2003? Are volumes to date for 2004 in line with the before rates volume forecast of flat marketing mail?

APWU/BOC-T1-2

The information provided in BOC-T-1 Table 1 and in response to OCA/BOC-T1-1(b) indicates that in 2002 there was a 30 percent increase in Bank One's Standard mail solicitation volume and a 12 percent decline in its First-Class mail solicitation volume. In 2003, Bank One's Standard volume declined 35 percent while its First Class solicitation mail volume increased 4 percent. Do these two years represent "normal volatility" in Bank One's solicitation volumes or were there special circumstances that account for some of these growth differences?

APWU/BOC-T1-3

What sort of activities is Bank One undertaking to increase its customers' use of electronic receipt/payment of bills? What sort of activities is JP Morgan Chase undertaking to increase its customers' use of electronic receipt/payment of bills? Would this NSA prompt the combined company to reassess any of its activities in this area?