

**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 )

**ANSWERS OF BANK ONE CORPORATION TO  
OFFICE OF CONSUMER ADVOCATE INTERROGATORIES  
OCA/BOC-T1-17-19  
(August 9, 2004)**

Bank One Corporation (“Bank One”) hereby provides the answers of witness Rappaport to Office of Consumer Advocate interrogatories OCA/BOC-T1-17-19, filed July 28, 2004. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

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August 9, 2004

**ANSWER OF BANK ONE WITNESS RAPPAPORT  
TO OCA INTERROGATORY OCA/BOC-T1-17**

**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.

**ANSWER:**

(a) Zero. Bank One does not receive returns of Standard Mail. Also, please see my response to Presiding Officer's Information Request No. 1, Question 1, which discusses past use of ACS for Standard Mail.

(b) Zero. Bank One does not receive physical returns for Standard Mail marketing flat mail.

(c) Less than 1%. My best estimate is approximately 0.6%.

**ANSWER OF BANK ONE WITNESS RAPPAPORT  
TO OCA INTERROGATORY OCA/BOC-T1-17**

(d)(i) In 2003, it was approximately 4%.

(d)(ii) Zero. J.P. Morgan Chase did not receive physical returns of Standard Mail.

(e) (i)-(ii) To the best of my knowledge, J.P. Morgan Chase did not mail a material number of marketing mail flats.

(f) Weighted based upon 2003 volumes, less than 0.5%.

(g)(i) Weighted based upon 2003 volumes, approximately 6%.

(g)(ii) Zero. Neither Bank One nor J.P. Morgan Chase receive returns of Standard Mail.

(h)(i) 11%. Also, please see my response to Presiding Officer's Information Request No. 1, Question 1(c), which indicates that Bank One's return rate for First-Class Mail flats has recently been running higher than 11%.

(h)(ii) Zero. Neither Bank One nor J.P. Morgan Chase receives returns of Standard Mail.

**ANSWER OF BANK ONE WITNESS RAPPAPORT  
TO OCA INTERROGATORY OCA/BOC-T1-18**

**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.

**ANSWER:**

Attachment OCA-BOC-T1-18 provides Bank One Standard Mail solicitation volumes separately for flats and letters for 2002, 2003, and year-to-date for 2004. The requested disaggregation is not available for earlier years.

**Attachment OCA/BOC-T1-18****Bank One Standard Mail solicitation volume**

<b>Month/Year</b>	<b>Volume (in millions)</b>		
	<b>Total</b>	<b>Letters</b>	<b>Flats</b>
2000	482.0		
2001	967.0		
Jan-02	75.2	73.6	1.7
Feb-02	93.9	91.7	2.2
Mar-02	77.1	76.4	0.7
Apr-02	93.9	89.6	4.3
May-02	91.7	88.2	3.5
Jun-02	151.2	146.9	4.3
Jul-02	119.4	115.1	4.3
Aug-02	152.9	148.4	4.5
Sep-02	86.6	82.4	4.2
Oct-02	117.3	113.1	4.2
Nov-02	81.9	77.8	4.1
Dec-02	119.7	116.7	3.0
Jan-03	59.5	59.5	0.0
Feb-03	76.1	76.1	0.0
Mar-03	65.7	65.7	0.0
Apr-03	66.5	66.5	0.0
May-03	32.8	32.8	0.0
Jun-03	72.8	71.7	1.1
Jul-03	31.0	31.0	0.0
Aug-03	86.0	86.0	0.0
Sep-03	71.1	71.1	0.0
Oct-03	124.9	121.5	3.3
Nov-03	68.9	68.9	0.0
Dec-03	68.8	65.7	3.1
Jan-04	46.0	44.6	1.4
Feb-04	129.4	126.6	2.8
Mar-04	59.6	58.8	0.8
Apr-04	162.8	158.6	4.2
May-04	106.8	103.6	3.2

**ANSWER OF BANK ONE WITNESS RAPPAPORT  
TO OCA INTERROGATORY OCA/BOC-T1-19**

**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.

**ANSWER:**

Over the past few weeks, I have worked closely with a number of employees and consultants from the J.P. Morgan Chase side of the merged company to search for the requested mail volume information, and have compiled the mail volumes by month for the period from January 2002 to June 2004. This information is contained in Attachment OCA-BOC-T1-19.xls. Meaningful data are not available for 2001 and earlier years.

**Attachment OCA/BOC-T1-19**

J.P. Morgan Chase First-Class solicitation mail volumes (in millions)

Month/Year	First-Class Mail Customer	First-Class Mail Solicitations	Standard Mail Solicitations
Jan-02	31.1	49.3	6.6
Feb-02	24.7	33.1	0.0
Mar-02	25.7	2.5	29.7
Apr-02	24.8	13.1	51.7
May-02	25.1	2.9	30.2
Jun-02	26.4	3.5	34.8
Jul-02	25.7	3.5	40.9
Aug-02	26.0	4.1	31.3
Sep-02	25.7	3.5	28.1
Oct-02	25.9	13.8	42.4
Nov-02	25.5	5.8	44.6
Dec-02	30.4	43.7	5.0
Jan-03	30.9	20.8	52.6
Feb-03	26.3	3.9	29.2
Mar-03	30.1	5.3	23.1
Apr-03	28.9	19.5	40.7
May-03	28.1	7.4	32.1
Jun-03	29.0	3.9	24.1
Jul-03	29.3	16.3	59.1
Aug-03	29.6	6.5	28.6
Sep-03	27.6	5.6	30.1
Oct-03	29.2	16.6	43.4
Nov-03	28.7	0.6	21.9
Dec-03	28.5	5.9	23.1
Jan-04	34.3	12.7	24.1
Feb-04	29.8	1.3	12.1
Mar-04	28.7	0.6	22.3
Apr-04	29.0	11.4	28.9
May-04	28.5	0.2	10.6
Jun-04	29.4	0.0	7.4

**Notes on Solicitation Volumes:**

1. Volume figures are for J.P. Morgan Chase's primary solicitation programs that comprise approximately 95 percent of J.P. Morgan Chase's solicitation volumes.
2. To the best of our knowledge, J.P. Morgan Chase does not send a material amount of marketing flats. Therefore, all solicitations are letters.
3. The January 2002 to March 2002 mail volumes in this attachment do not include a program that averaged less than 0.5 million First-Class Mail and less than 1 million Standard Mail pieces per month for the April 2002 to June 2004 period. This is because data were unavailable.
4. The 2002 mail volumes in this attachment do not include a program that averaged no First-Class Mail and less than 0.6 million Standard Mail pieces per month during the January 2003 to June 2004 period. This is because 2002 data for this program were unavailable.
5. To this point, we have been unable to categorize precisely the actual volume for some solicitation programs by month. In these situations, we mapped volumes to months using available data. Much of the volatility in month-to-month volume, and the apparent tendency of volumes to be higher in the first months of each quarter, are likely due to imperfections in this mapping.

## 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

August 9, 2004