

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Postal Rate Commission  
Submitted 9/1/2004 2:29 pm  
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RATE AND SERVICE CHANGES TO IMPLEMENT  
FUNCTIONALLY EQUIVALENT NEGOTIATED  
SERVICE AGREEMENT WITH BANK ONE  
CORPORATION

Docket No. MC2004-3

REVISED RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS  
PLUNKETT TO INTERROGATORY OF THE OFFICE OF THE CONSUMER  
ADVOCATE (OCA/USPS-T1-44) (ERRATA)  
(September 1, 2004)

The United States Postal Service hereby revises its response to the following interrogatory of the Office of Consumer Advocate: OCA/USPS-T1-44, filed on August 5, 2004. The initial Postal Service response was filed on August 16, 2004. As indicated in both OCA's Motion for An Extension to September 3, 2004 to Request Hearing, and the August 19, 2004 Report of the Settlement Coordinator, the Postal Service was working to provide a more complete answer to interrogatory OCA/USPS-T1-44. The result of that work is now provided below.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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September 1, 2004

RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS PLUNKETT TO  
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

REVISED 9/1/04

**OCA/USPS-T1-44.** Please reproduce Appendix A of USPS-T-1 for J.P. Morgan Chase.

**RESPONSE:**

To provide a more complete answer, the Postal Service modeled the financial effects of a hypothetical scenario in which integration of all J.P. Morgan Chase (“JPM Chase”) mail volumes into the Bank One negotiated service agreement (“NSA”) occurs on January 1, 2005, the beginning of Year 2 of the NSA. Because, under this hypothetical, integration of JPM Chase volumes would not occur until Year 2 of the NSA, the model assumes that, in Year 1, only Bank One First-Class Mail volumes will be counted towards the threshold and be eligible to receive discounts in the first year of the NSA. The model is further explained in the revised response to OCA/USPS-T1-45.

The Postal Service relies on the Direct Testimony of Brad Rappaport on Behalf of Bank One Corporation (BOC-T-1), as well as several Bank One responses to OCA interrogatories. I have reviewed Mr. Rappaport’s testimony, as well as the relevant interrogatory responses, and affirm that they may be relied upon in presentation of the Postal Service’s direct case.

# Combined Bank One / JPM Chase Model YEAR 2 INTEGRATION

Negotiated Service Agreement

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(13) (14)  
Year 1 Year 2 Year 3

## Return Forecast

(1) Operational Mail (Ops)	0.34%	0.45%	0.46%
(1a) Bank One	0.34%	0.34%	0.34%
(1b) JPM Chase	0.60%	0.60%	0.60%
(2) Marketing Mail - Letters (Mktg)	9.00%	6.17%	6.10%
(2a) Bank One	9.00%	9.00%	9.00%
(2b) JPM Chase	4.00%	4.00%	4.00%
(3) Marketing Mail - Flats (Bank One)	11.00%	11.00%	11.00%
(4) USPS FCM average return rates	1.23%	1.23%	1.23%

## Unit cost assumptions

(5) Inflation cost adjustment factor	4.0%	4.0%	4.0%
(6) Manual Flat Returns Unit Cost	\$ 1.04	\$ 1.09	\$ 1.13
(7) Manual Letter Returns Unit Cost	\$ 0.55	\$ 0.57	\$ 0.60
(8) Electronic Flat Returns Unit Cost	\$ 0.45	\$ 0.47	\$ 0.48
(9) Electronic Letter Returns Unit Cost	\$ 0.34	\$ 0.36	\$ 0.37
(10) Address Change Service (ACS) Success Rate	85.0%	85.0%	85.0%
(11) Percent of new marketing mail switched from Standard Mail (SM)	100.0%	100.0%	100.0%
(12) Contingency Factor	1.030		

- (1) Weighted average of (1a) and (1b)
- (1a) BOC-T-1
- (1b) OCA/BOC-T1-17
- (2) Weighted average of 2(a) and 2(b)
- (2a) BOC-T-1
- (2b) OCA/BOC-T1-17
- (3) BOC-T-1
- (4) USPS-LR-1/MC2002-2
- (5) MC 2004-3 USPS T-1 at page 13
- (6) Manual Return Costs (\$1.0190) \* (1 + (5))
- (7) USPS-LR-1/MC2002-2 \* (1 + (5))
- (8) Electronic Returns Costs (\$0.4301) \* (1 + (5))
- (9) USPS-LR-1/MC2002-2 \* (1 + (5))
- (10) USPS witness Wilson, T4/MC2002-2
- (11) BOC-T-1
- (12) USPS-LR-1/MC2002-2
- (13) Year 1 \* (5)
- (14) Year 2 \* (5)

**Combined Bank One / JPM Chase Model YEAR 2 INTEGRATION**  
 Negotiated Service Agreement  
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	2001	2002	2003	Year 1	Year 2	Year 3
<b>(1) Volume calculations -- Combined Bank One and JPM Chase</b>						
<b>Before rates</b>						
Operational mail	479,134,992	508,411,769	500,423,407	506,650,000	887,250,000	911,150,000
Marketing mail letter	79,215,956	38,870,004	59,703,685	29,387,000	67,587,000	69,987,000
Marketing mail flat	24,704,043	52,897,842	35,828,439	35,043,000	35,043,000	35,043,000
<b>Total</b>	<b>583,054,991</b>	<b>600,179,615</b>	<b>595,955,531</b>	<b>571,080,000</b>	<b>989,880,000</b>	<b>1,016,180,000</b>
<b>After rates</b>						
Operational mail				506,650,000	887,250,000	911,150,000
Marketing mail letter				48,442,000	225,542,000	231,442,000
Marketing mail flat				35,043,000	35,043,000	35,043,000
<b>Total</b>				<b>590,135,000</b>	<b>1,147,835,000</b>	<b>1,177,635,000</b>
<b>(2) Volume calculations -- Bank One</b>						
<b>Before rates</b>						
Operational mail	479,134,992	508,411,769	500,423,407	506,650,000	506,650,000	506,650,000
Marketing mail letter	79,215,956	38,870,004	59,703,685	29,387,000	29,387,000	29,387,000
Marketing mail flat	24,704,043	52,897,842	35,828,439	35,043,000	35,043,000	35,043,000
<b>Total</b>	<b>583,054,991</b>	<b>600,179,615</b>	<b>595,955,531</b>	<b>571,080,000</b>	<b>571,080,000</b>	<b>571,080,000</b>
<b>After rates</b>						
Operational mail				506,650,000	506,650,000	506,650,000
Marketing mail letter				48,442,000	128,442,000	128,442,000
Marketing mail flat				35,043,000	35,043,000	35,043,000
<b>Total</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>590,135,000</b>	<b>670,135,000</b>	<b>670,135,000</b>
<b>(3) Volume calculations -- JPM Chase</b>						
<b>Before rates</b>						
Operational mail		317,000,000	346,000,000	Not Integrated 358,100,000	380,600,000	404,500,000
Marketing mail letter		158,200,000	115,700,000	112,400,000	38,200,000	40,600,000
Marketing mail flat					-	-
<b>Total</b>	<b>-</b>	<b>475,200,000</b>	<b>461,700,000</b>	<b>470,500,000</b>	<b>418,800,000</b>	<b>445,100,000</b>
<b>After rates</b>						
Operational mail				---	380,600,000	404,500,000
Marketing mail letter				---	97,100,000	103,000,000
Marketing mail flat					-	-
<b>Total</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>---</b>	<b>477,700,000</b>	<b>507,500,000</b>

- (1) MC 2004-3 BOC T-1 at page 5 - 6
- (2) MC 2004-3 BOC T-1 at page 5 - 6
- (3) OCA/BOC-T1-13,19; OCA/USPS-T1-44 (Rappaport)

**Assumes start of YEAR 2 is date of integration of mail streams. YEAR 1 only applies to Bank One**

- (1) YEAR 1 only includes Bank One BR and AR forecasts  
 YEAR 2 and YEAR 3 Before Rates and After Rates volume is sum of Chase and Bank One BR and AR forecasts

**Combined Bank One / Chase Model YEAR 2**

Page 3	Bank One Ops			Bank One Marketing			JPM Chase Ops			JPM Chase Marketing		
	(1) FY 2003 Volume	(2) Current Rates	(3) Revenue									
<b>Rate Category</b>												
Single-Piece Letters												
First Ounces, except QBRM	-	0.370	\$ -	-	0.370	\$ -	-	0.370	\$ -	-	0.370	\$ -
Qualified Business Reply Mail	-	0.340	-	-	0.340	-	-	0.340	-	-	0.340	-
Additional Ounces	-	0.230	-	-	0.230	-	-	0.230	-	-	0.230	-
Nonmachinable Pieces	-	0.120	-	-	0.120	-	-	0.120	-	-	0.120	-
Single-Piece revenue	-	-	-	-	-	-	-	-	-	-	-	-
Revenue Adjustment Factor (a)	-	-	1,000	-	-	1,000	-	-	1,000	-	-	1,000
(4) Total Single-Piece Postage Revenue	-	-	-	-	-	-	-	-	-	-	-	-
Nonautomated Presorted Letters												
First Ounce	16,896,034	0.352	5,947,404	5,469	0.352	1,925	8,946,611	0.352	3,149,207	3,457,992	0.352	1,217,213
Additional Ounces	152,925	0.225	34,408	57,088	0.225	12,845	144,098	0.225	32,422	1,879	0.225	423
Nonmachinable Pieces	16,555	0.055	911	8,044	0.055	442	1,574	0.055	87	881	0.055	48
Heavy Piece Deduction	3,950	(0.041)	(162)	117	(0.041)	(5)	1,657	(0.041)	(68)	209	(0.041)	(9)
Nonautomated Presorted revenue	-	-	5,982,561	-	-	15,208	-	-	3,181,648	-	-	1,217,676
Revenue Adjustment Factor (a)	-	-	1,000	-	-	1,000	-	-	1,000	-	-	1,000
(5) Total Nonautomated Presorted Letters Revenue	-	-	5,982,561	-	-	15,208	-	-	3,181,648	-	-	1,217,676
Automation Presort Letters												
Mixed AADC Letters	3,462,228	0.309	1,069,828	159,789	0.309	49,375	10,984,696	0.309	3,394,271	4,408,533	0.309	1,362,237
AADC Letters	5,935,849	0.301	1,786,691	157,854	0.301	47,514	6,296,102	0.301	1,895,127	2,801,011	0.301	843,104
3-Digit Letters	321,218,301	0.292	93,795,744	20,459,211	0.292	5,974,090	234,204,476	0.292	68,387,707	70,473,036	0.292	20,578,127
5-Digit Letters	150,886,728	0.278	41,946,510	38,358,545	0.278	10,663,676	84,306,169	0.278	23,437,115	30,711,496	0.278	8,537,796
Additional Ounces	3,822,232	0.225	860,002	2,490,380	0.225	560,336	3,554,768	0.225	799,823	57,448	0.225	12,926
Heavy Piece Deduction	51,555	(0.041)	(2,114)	20,081	(0.041)	(823)	10,419	(0.041)	(427)	844	(0.041)	(35)
Automation Presort Letters	-	-	139,456,662	-	-	17,294,166	-	-	97,913,615	-	-	31,334,155
Revenue Adjustment Factor (a)	-	-	1,000	-	-	1,000	-	-	1,000	-	-	1,000
(6) Total Automation Presort Letters Revenue	-	-	139,456,662	-	-	17,294,166	-	-	97,913,615	-	-	31,334,155
Automation Carrier Route Letters												
First Ounce	115,591	0.275	31,787	462,363	0.275	127,150	-	0.275	-	237,934	0.275	65,432
Additional Ounces	-	0.225	-	-	0.225	-	-	0.225	-	-	0.225	-
Heavy Piece Deduction	-	(0.041)	-	-	(0.041)	-	-	(0.041)	-	-	(0.041)	-
Automation Carrier Route Revenue	-	-	31,787	-	-	127,150	-	-	-	-	-	65,432
Revenue Adjustment Factor (a)	-	-	1,000	-	-	1,000	-	-	1,000	-	-	1,000
(7) Automation Carrier Route Letters Revenue	-	-	31,787	-	-	127,150	-	-	-	-	-	65,432
(8) Total Company Letters Subclass			\$ 145,471,010			\$ 17,436,524			\$ 101,095,263			\$ 32,617,262
Total pieces			498,514,731			59,603,231			344,738,054			112,090,002
(9) Revenue per piece			0.292			0.293			0.293			0.291

(a) Revenue Adjustment factor not required because customer specific revenue presented  
(1) CBCIS 2003 Bank One and JPM Chase Volume Data  
(2) Rate Schedule  
(3) (1) \* (2)  
(4) Single Piece Revenue \* Revenue Adjustment Factor  
(5) Nonautomated Presorted Revenue \* Revenue Adjustment Factor  
(6) Automation Presort Letter Revenue \* Revenue Adjustment Factor  
(7) Automation Carrier Route Revenue \* Revenue Adjustment Factor  
(8) (4) + (5) + (6) + (7)  
(9) (8) / Total pieces





**Combined Bank One / JPM Chase Model YEAR 2 INTEGRATION**

Negotiated Service Agreement

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Year 1

Year 2

Year 3

**Agreement Structure**

\*\* Threshold adjusted in YEAR 2 and 3 per contract stipulation 612.34 of the NSA contract (535+358.1+112.4)

Year 1		Year 2				Year 3					
Threshold		Discount		Threshold		Discount		Threshold		Discount	
535,000,000	560,000,000	\$	0.025	1,005,500,000	1,030,500,000	\$	0.025	1,005,500,000	1,030,500,000	\$	0.025
560,000,000	585,000,000	\$	0.030	1,030,500,000	1,055,500,000	\$	0.030	1,030,500,000	1,055,500,000	\$	0.030
585,000,000	610,000,000	\$	0.035	1,055,500,000	1,080,500,000	\$	0.035	1,055,500,000	1,080,500,000	\$	0.035
610,000,000	645,000,000	\$	0.040	1,080,500,000	1,115,500,000	\$	0.040	1,080,500,000	1,115,500,000	\$	0.040
645,000,000	680,000,000	\$	0.045	1,115,500,000	1,150,500,000	\$	0.045	1,115,500,000	1,150,500,000	\$	0.045
680,000,000		\$	0.050	1,150,500,000		\$	0.050	1,150,500,000		\$	0.050

**Discount on volume above threshold**

(1) Before Rates Forecast	571,080,000	989,880,000	1,016,180,000
(2) After Rates Forecast	590,135,000	1,147,835,000	1,177,635,000
Discount in first tier	\$ 625,000	\$ 625,000	\$ 625,000
Discount in second tier	\$ 750,000	\$ 750,000	\$ 750,000
Discount in third tier	\$ 179,725	\$ 875,000	\$ 875,000
Discount in fourth tier	\$ -	\$ 1,400,000	\$ 1,400,000
Discount in fifth tier	\$ -	\$ 1,455,075	\$ 1,575,000
Discount in sixth tier	\$ -	\$ -	\$ 1,356,750
(3) <b>Discount Earned</b>	<b>\$ 1,554,725</b>	<b>\$ 5,105,075</b>	<b>\$ 6,581,750</b>

**Exposure on volume above threshold**

(4) Threshold	535,000,000	1,005,500,000	1,005,500,000
(5) Before Rates Forecast	571,080,000	989,880,000	1,016,180,000
(6) Exposed Pieces	36,080,000	-	10,680,000
(7) After Rates Forecast	590,135,000	1,147,835,000	1,177,635,000
Exposure in first tier	\$ 625,000	\$ -	\$ 267,000
Exposure in second tier	\$ 332,400	\$ -	\$ -
Exposure in third tier	\$ -	\$ -	\$ -
Exposure in fourth tier	\$ -	\$ -	\$ -
Exposure in fifth tier	\$ -	\$ -	\$ -
Exposure in sixth tier	\$ -	\$ -	\$ -
(8) <b>Total Exposure</b>	<b>\$ 957,400</b>	<b>\$ -</b>	<b>\$ 267,000</b>

- (1) Before Rates Total Volume (Volume calcs)
- (2) After Rates Total Volume (Volume calcs)
- (3) Sum of discounts earned in first tier to sixth tier
- (4) Agreement Structure Beginning Threshold
- (5) (1)
- (6) Before rates - Threshold: The number of total pieces on which leakage occurs
- (7) (2)
- (8) Sum of leakage in first tier to sixth tier

# Combined Bank One / JPM Chase Model YEAR 2 INTEGRATION

Negotiated Service Agreement

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	##	Year 1	Year 2	Year 3
<b>Return Costs</b>				
UAA Rate				
(1)	Operational Mail	0.3%	0.5%	0.5%
(2)	Marketing mail letter	9.0%	6.2%	6.1%
(3)	Marketing mail flat	11.0%	11.0%	11.0%
<b>Before Rates Forecast</b>				
(4)	Operational Mail	506,650,000	887,250,000	911,150,000
(5)	Marketing mail letter	29,387,000	67,587,000	69,987,000
(6)	Marketing mail flat	35,043,000	35,043,000	35,043,000
<b>After Rates Forecast</b>				
(7)	Operational Mail	506,650,000	887,250,000	911,150,000
(8)	Marketing mail letter	48,442,000	225,542,000	231,442,000
(9)	Marketing mail flat	35,043,000	35,043,000	35,043,000
<b>Return Forecast</b>				
(10)	Operational Mail	1,722,610	4,006,210	4,149,610
(11)	Marketing mail letter	2,644,830	4,172,830	4,268,830
(12)	Marketing mail flat	3,854,730	3,854,730	3,854,730
<b>Return Costs</b>				
(13)	Operational Mail	\$ 949,503	\$ 2,296,552	\$ 2,473,906
(14)	Marketing mail letter	\$ 1,457,830	\$ 2,392,066	\$ 2,544,982
(15)	Marketing mail flat	\$ 4,022,592	\$ 4,183,496	\$ 4,350,835
(16)	Total	\$ 6,429,925	\$ 8,872,114	\$ 9,369,724
<b>After Rates Return Costs</b>				
(17)	Operational Mail	\$ 949,503	\$ 2,296,552	\$ 2,473,906
(18)	Marketing mail letter	\$ 990,224	\$ 1,624,800	\$ 1,728,667
(19)	Marketing mail flat	\$ 2,069,144	\$ 2,151,910	\$ 2,237,986
(20)	Total	\$ 4,008,871	\$ 6,073,261	\$ 6,440,559
<b>(21) Return Cost Savings</b>		<b>\$ 2,421,054</b>	<b>\$ 2,798,853</b>	<b>\$ 2,929,165</b>

- (1) Page 1, (1)
- (2) Page 1, (2)
- (3) Page 1, (3)
- (4) Page 2, (1)
- (5) Page 2, (1)
- (6) Page 2, (1)
- (7) Page 2, (1)
- (8) Page 2, (1)
- (9) Page 2, (1)
- (10) (1) \* (4)
- (11) (2) \* (5)
- (12) (3) \* (6)
- (13) (10) \* Manual Letter Returns Unit Cost (Assumptions)
- (14) (11) \* Manual Letter Returns Unit Cost (Assumptions)
- (15) (12) \* Manual Flats Returns Unit Cost (Assumptions)
- (16) (13) + (14) + (15)
- (17) (10) \* Manual Letter Returns Unit Cost (Assumptions)
- (18) ((11) \* ACS Success Rate \* Electronic Letter Returns Unit Cost) + (1 - ACS Success Rate) \* Manual Letter Returns Unit Cost \* (11)
- (19) ((12) \* (1 - ACS Success Rate) \* Manual Flat Returns Unit Cost) + ((12) \* ACS Success Rate \* Electronic Flat Returns Unit Cost)
- (20) (17) + (18) + (19)
- (21) (16) - (20)

# Combined Bank One / JPM Chase Model YEAR 2 INTEGRATION

Negotiated Service Agreement

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## (1) Standard Mail Regular Revenue per piece

Mail Category	Revenue per piece	Volume	Weighted Avg.
Mixed AADC Auto	\$ 0.211	14,909,235	3,152,805
AADC Auto	\$ 0.199	54,590,401	10,890,478
3-Digit Auto	\$ 0.183	449,527,587	82,432,060
5-Digit Auto	\$ 0.166	404,644,679	67,231,338
Basic Nonauto	\$ 0.259	9,140,988	2,367,494
3/5 Digit Nonauto	\$ 0.237	7,037,907	1,667,561
Total Volume		939,850,797	167,741,737
Revenue per piece			\$ 0.178

## (2) Standard Mail ECR Revenue per piece

Mail Category	Revenue per piece	Volume	Weighted Avg.
Basic Nonauto Letters	\$ 0.182	11,093,337	2,015,552
Basic Auto Letters	\$ 0.148	25,699,949	3,805,740
High-Density Letters	\$ 0.164	25,764	4,225
Saturation Letters	\$ 0.152	727,170	110,530
W Total Volume		37,546,220	5,936,047
Revenue per piece			\$ 0.158

## (3) Average Revenue per piece

**\$ 0.178**

- (1) Rate Schedule
- (2) Rate Schedule
- (3)  $(\text{Standard Mail Regular Revenue} + \text{Standard Mail ECR Revenue}) / (\text{Standard Mail Regular Total Volume} + \text{Standard Mail ECR Total Volume})$

**Combined Bank One / JPM Chase Model YEAR 2 INTEGRATION**

Negotiated Service Agreement

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**Standard Regular Unit Cost**

	From Docket No. R2001-1									BANK ONE/JPM Chase		
	TYBR 2003 Total Unit Cost (Dollars) (1)	TYBR 2003 Mail Proc Unit Cost (Dollars) (2)	TYBR 2003 Delivery Unit Cost (Dollars) (3)	TYBR 2003 Other Unit Cost (Dollars) (4)	TYBR 2003 Total Unit Cost (Dollars) (5)	FY 2004 Total Unit Cost (Dollars) (6)	BY 2000 Mail Volume (Pieces) (7)	FY 2003 Mail Volume (Pieces) (8)	FY 2003 Mail Volume (Percent) (9)	TY 2004 Total Unit Cost (Dollars) (10)	FY 2003 Mail Volume (Pieces) (11)	FY 2003 Mail Volume (Percent) (12)
<b>LETTERS</b>												
Nonauto Basic		0.130	0.042	0.01	0.18	0.19	1,322,401,662	1,411,242,831	3.2%	0.19	9,140,988	1.0%
Nonauto 3/5-Digit		0.121	0.044	0.01	0.17	0.18	4,476,247,838	2,481,782,907	5.7%	0.18	7,037,907	0.7%
Auto Mixed AADC		0.050	0.039	0.01	0.10	0.10	2,354,963,527	2,687,599,740	6.1%	0.10	14,909,235	1.6%
Auto AADC		0.043	0.038	0.01	0.09	0.09	2,875,476,520	2,848,636,910	6.5%	0.09	54,590,401	5.8%
Auto 3-digit		0.040	0.038	0.01	0.08	0.09	15,600,801,986	17,815,958,778	40.6%	0.09	449,527,587	47.8%
Auto 5-digit		0.031	0.037	0.01	0.07	0.08	11,222,413,732	16,604,952,264	37.9%	0.08	404,644,679	43.1%
<b>Total/average</b>	<b>0.10</b>	<b>0.05</b>	<b>0.04</b>	<b>0.01</b>	<b>0.10</b>	<b>0.09</b>	<b>37,852,305,265</b>	<b>43,850,172,430</b>	<b>100.0%</b>	<b>0.09</b>	<b>939,850,797</b>	<b>100.0%</b>
Company average letter cost 2003		0.09										

**Standard ECR Unit Cost**

	TY 2004 Unit Costs (cents) (13)			TY 2004 Delivery Unit Costs (cents) (16)	FY 2003 Mail Volume (Pieces) (17)	FY 2003 Mail Volume (Percent) (18)
Total ECR letter unit cost	0.070	(14)				
Total ECR letter delivery unit cost	0.052	(15)				
ECR Basic Auto Letters	0.048		25,699,949			68.4%
ECR Basic Letters	0.066		11,093,337			29.5%
ECR High Density Letters	0.049		25,764			0.1%
ECR Saturation Letters	0.035		727,170			1.9%
<b>Total</b>			<b>37,546,220</b>			
Company Average letter ECR Unit Delivery Cos:				0.053	(19)	
Company Delivery Cost Adjustmen:				0.001	(20)	
Company ECR total letter unit cost:				<b>0.071</b>	(21)	

(22) Average Cost per piece 0.085 (22)

(23) Average Cost per piece, Including Contingenc: 0.088 (23)

- (1) Docket No. R2001-1, LR-J-58, LR58AREG.xls, total unit letter costs
- (2) Docket R2001-1, LR-J-60 Revised 11/15/01
- (3) Docket R2001-1, LR-J-60 Revised 11/15/01
- (4) (1) - average from (2) - average from (3)
- (5) (2) + (3) + (4)
- (6) (5) \* (1 + inflation cost adjustment factor)
- (7) Docket No. R2001, PRC, LR-4, SM base year volumes from SM letter model.
- (8) Revenue, Pieces, and Weight (RPW) Report.
- (9) Each row in (8) divided by total in (8)
- (10) (6)
- (11) CBCIS 2003 Standard Mail Volume Data
- (12) Each row in columnn (11) divided by total in column (11)
- (13) Weighted average costs calculated by multiplying column (10) by column (12)
- (14) Docket No. R2001-1, LR-J-58, LR58AECR.xls, total TY2003 ECR unit letter costs
- (15) Docket No. R2001-1, LR-J-58, LR58AECR.xls, sum of TY2003 ECR unit letter delivery costs  
(Cost segments 6, 7 and 10) \* inflationary cost adjustment factor (Assumptions)
- (16) Docket No. R2001-1, LR-J-117, Revised 1/22/02, TY2003 unit delivery costs \* inflationary cost adjustment factor (Assumptions)
- (17) CBCIS 2003 Standard Mail Volume Data
- (18) Percent of volume in each row of (17) divided by total in (17)
- (19) Weighted average of the unit costs in (16) weighted by the volume percents in (18)
- (20) (15) - (19)
- (21) (14) + (20)
- (22) ((13 \* 11) + (21 \* 17)) / (11 + 17)
- (23) (22) \* Contingency Factor (Assumptions)

**Combined Bank One / JPM Chase Model YEAR 2 INTEGRATION**

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Year 1

Year 2

Year 3

**First Class Letter**

<b>(1)a First-Class Operational Letter revenue per piece</b>	<b>0.292</b>	<b>0.292</b>	<b>0.292</b>
<b>(1)b First-Class Marketing Letter revenue per piece</b>	<b>0.293</b>	<b>0.292</b>	<b>0.292</b>
<b>(2) First-Class Operational Letter cost per Piece Before Rates</b>	<b>0.107</b>	<b>0.112</b>	<b>0.116</b>
<b>(3) First-Class Operational Letter cost per Piece After Rates</b>	<b>0.107</b>	<b>0.112</b>	<b>0.116</b>
<b>(4) First-Class Operational Letter avg. Contribution Before Rates</b>	<b>0.185</b>	<b>0.180</b>	<b>0.176</b>
<b>(5) First-Class Operational Letter avg. Contribution After Rates</b>	<b>0.185</b>	<b>0.180</b>	<b>0.176</b>
<b>(6) First-Class Marketing Letter cost per Piece Before Rates</b>	<b>0.146</b>	<b>0.142</b>	<b>0.147</b>
<b>(7) First-Class Marketing Letter cost per Piece After Rates</b>	<b>0.130</b>	<b>0.130</b>	<b>0.135</b>
<b>(8) First-Class Marketing Letter avg. Contribution Before Rates</b>	<b>0.145</b>	<b>0.150</b>	<b>0.145</b>
<b>(9) First-Class Marketing Letter avg. Contribution After Rates</b>	<b>0.163</b>	<b>0.162</b>	<b>0.157</b>

**Standard Mail**

(10) Standard Revenue per Piece	0.178	0.178	0.178
(11) Standard Cost per Piece	0.088	0.091	0.095
(12) Standard Letter Contribution per Piece	0.090	0.087	0.083

- (1)a Weighted average of Bank One and JPM Chase revenue per piece
- (1)b Weighted average of Bank One and JPM Chase revenue per piece
- (2) Weighted average of Bank One and JPM Chase cost per piece
- (3) Weighted average of Bank One and JPM Chase cost per piece
- (4) (1a) - (2)
- (5) (1a) - (3)
- (6) Weighted average of Bank One and JPM Chase cost per piece
- (7) Weighted average of Bank One and JPM Chase cost per piece
- (8) (1b) - (6)
- (9) (1b) - (7)
- (10) Average Revenue per Piece (SM rev calcs)
- (11) Average Cost per Piece, Including Contingency (SM cost calcs)
- (12) (10) - (11)

## Combined Bank One / JPM Chase Model YEAR 2 INTEGRATION

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	Year 1	Year 2	Year 3	Total
<b>ACS Savings</b>				
(1) Operational Mail	\$ -	\$ -	\$ -	\$ -
(2) Marketing Mail Letter	\$ 481,634	\$ 790,285	\$ 840,804	\$ 2,112,723
(3) Marketing Mail Flat	\$ 2,012,052	\$ 2,092,534	\$ 2,176,235	\$ 6,280,820
<b>Contribution from New Volume</b>				
(4) Operational Mail	-	\$ -	\$ -	\$ -
<b>(5) Marketing Mail Letter</b>	<b>\$ 1,380,038</b>	<b>\$ 11,866,781</b>	<b>\$ 11,898,505</b>	<b>\$ 25,145,324</b>
<b>(6) Total Exposure</b>	<b>\$ 957,400</b>	<b>\$ -</b>	<b>\$ 267,000</b>	<b>\$ 1,224,400</b>
<b>(7) Total Incremental Discounts</b>	<b>\$ 597,325</b>	<b>\$ 5,105,075</b>	<b>\$ 6,314,750</b>	<b>\$ 12,017,150</b>
<b>(8) Total USPS Value</b>	<b>\$ 2,318,999</b>	<b>\$ 9,644,524</b>	<b>\$ 8,333,794</b>	<b>\$ 20,297,318</b>

(1) UAA Calcs, ((13)-(17))\*1.03

(2) UAA Calcs, ((14)-(18))\*1.03

(3) UAA Calcs, ((15)-(19))\*1.03

(4) (Operational Mail After Rates - Operational Mail Before Rates) \* FCM Operational Letter avg. Contribution After Rates

(5) (Marketing Mail Letter After Rates - Marketing Mail Letter Before Rates) \* (FCM Marketing Letter avg. Contribution After Rates - SM Contribution)

(6) Disc&Exp, (8)

(7) Disc&Exp, (3)-(8)

(8) (1) + (2) + (3) + (4) + (5) - (6) - (7)

# Combined Bank One / JPM Chase Model YEAR 2 INTEGRATION

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## Special Services Update Address Change Service (ACS Flats)

	Total cost/piece		Frequency		Weighted Cost/Piece	
<b>ACS COA Notification</b>						
Mechanized Terminal	\$0.0660	[1]	0.00	[7]	\$0.0000	[14]
Non-Mechanized Terminal	\$0.2691	[2]	1.00	[8]	\$0.2691	[15]
					\$0.2691	[16]
<b>ACS Nixie Processing</b>						
Nixie Clerk handling	\$0.0000	[3]	1.00	[9]	\$0.0000	[17]
ACS Nixie Keying	\$0.2074	[4]	1.00	[10]	\$0.2074	[18]
					\$0.2074	[19]

			% of ACS Volume		Volume Weighted Cost per Piece	
ACS COA notification	\$0.2691	[5]	58.03%	[11]	\$0.1561	[20]
ACS Nixie processing	\$0.2074	[6]	41.97%	[12]	\$0.0870	[21]
<b>TOTAL COST PER PIECE</b>			100.00%	[13]	<b>\$0.243</b>	[22]

- |   |                                    |
|---|------------------------------------|
| [1] USPS LR-I-110, Table 5.2.2, cell J31      | [12] Nixie Pieces/Total ACS Volume |
| [2] USPS LR-I-110, Table 5.2.2, cell J32      | [13] [11]+[12]                     |
| [3] These costs are treated as institutional. | [14] [1]*[7]                       |
| [4] USPS LR-I-110, Table 5.2.2, cell J29      | [15] [2]*[8]                       |
| [5] [16]                                      | [16] [14]+[15]                     |
| [6] [3]+[4]                                   | [17] [3]*[9]                       |
| [7] USPS LR-I-110, Table 5.2.2, cell L31      | [18] [4]*[10]                      |
| [8] USPS LR-I-110, Table 5.2.2, cell L32      | [19] [17]+[18]                     |
| [9] All nixies subject to clerk processing.   | [20] [5]*[11]                      |
| [10] All nixies subject to keying.            | [21] [6]*[12]                      |
| [11] ACS "keyed only" pieces/Total ACS Volume | [22] [20]+[21]                     |

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## Physical Return Costs

Cost for UAA Mail Being Returned to Sender  
Physical Flat Mailpieces Returned

	A	B	C	D	E
	Annual Volume (Thousands)	Cost/Piece	Annual Cost (Thousands)	Frequency	Weighted Cost/Piece
1.	69,209 (1)	\$0.0545 (2)	\$3,771	1.00	\$0.0545
2.	33,866 (3)	\$0.2711 (4)	\$9,181	0.49 (5)	\$0.1327
3.	24,021 (6)	\$0.5381 (7)	\$12,926	0.35 (8)	\$0.1868
4.	69,209 (1)	\$0.6295 (9)	\$43,567	1.00	\$0.6295
<b>5. Total</b>					<b>\$1.0034</b>

(1) Refer to Table 5.2.1.2, Row 3.a, Column D (USPS LR-J-69).

(2) Refer to Table 5.2.1.2, Row 3.a, Column G (USPS-LR-J-69).

(3) Refer to Table 5.2.1.3.1 (USPS-JR-J-69). This is the sum of Row 1, Column A and a portion of Row 3, Column A. Refer to Volume Section, Volume Profile, Table 4.3, "Disposition at CFS Unit", of the portion of mail that is returned to sender.

(4) This is the ratio of Table 5.2.1.3, Column H, and Table 5.2.1.3.1, Column A, Row 4 (USPS-LR-J-69).

(5) This is the portion of return to sender mail that is returned by the Nixie clerk at the delivery unit, along with the portion of ACS Nixie that is returned at the CFS unit. This is the ratio of Rows 2 and 1, Column A.

(6) Refer to Volume Section, Volume Profile, Table 4.3, "Disposition at CFS Unit", Total Returned.

(7) Refer to Table 5.2.2, Column G, (Non-ACS) Total. Non Mach terminal cost/piece is used.

(8) This is the portion of return to sender mail returned from the CFS unit, along with the portion of ACS Nixie that is returned from the CFS unit. This is the ratio of Rows 3 and 1, Column A, Table 5.2.2.

(9) Refer to Table 5.2.4.1, Row 2, Column F. This Number was calculated based on data obtained from USPS Cost Attribution

# Combined Bank One / Chase Model YEAR 2 INTEGRATION

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## Electronic "Return" Costs

Cost of UAA Mail Being Returned to Sender  
Bank One Accepts ACS Flats

	A	B	C	D	E
	Annual Volume (Thousands)	Cost/Piece (1)	Annual Cost (Thousands)	Frequency	Weighted Cost/Piece
1.	69,209 (1)	\$0.0545 (2)	\$3,771	1.00	\$0.0545
2.	33,866 (3)	\$0.2711 (4)	\$9,181	0.49 (5)	\$0.1327
3. eACS					\$0.2430 (6)
<b>4. Total</b>					<b>\$0.4301</b>

(1) Refer to Table 5.2.1.2, Row 3.a, Column D (USPS LR-J-69).

(2) Refer to Table 5.2.1.2, Row 3.a, Column G (USPS-LR-J-69).

(3) Refer to Table 5.2.1.3.1 (USPS-JR-J-69). This is the sum of Row 1, Column A and a portion of Row 3, Column A. Refer to Volume Section, Volume Profile, Table 4.3, "Disposition at CFS Unit", of the portion of mail that is returned to sender.

(4) This is the ratio of Table 5.2.1.3, Column H, and Table 5.2.1.3.1, Column A, Row 4 (USPS-LR-J-69).

(5) This is the cost of the Nixie clerk preparing mail for the CFS unit (USPS-LR-1/MC2002-2, page 1, row 2 as proxie).

(6) From Tab 3 of USPS LR-J-69.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

---

Nan K. McKenzie

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
September 1, 2004