

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268B0001

Rate And Service Changes To Implement
Functionally Equivalent Negotiated Service
Agreement With Bank One Corporation

Docket No. MC2004-3

**NOTICE OF FILING OF ERRATA TO
POSTAL SERVICE MEMORANDUM ON RECONSIDERATION**

The Postal Service hereby provides notice that it is filing revisions to its Memorandum on Reconsideration and to the Declaration of Michael K. Plunkett. On May 16, 2005, the Postal Service filed its Memorandum, which attached Mr. Plunkett's declarations from witness Plunkett and two others. It also filed a motion for leave to file the memorandum one day out of time citing technical problems with the preparation and electronic filing of the Memorandum. Mr. Plunkett's declaration presented particularly challenging technical issues because codes apparently lurking within the document obliterated the ability to format and edit it easily. The time spent struggling with the completion of the declaration infringed on the time needed to complete the editing of the memorandum and left insufficient time to upload the large pdf file consolidating the memorandum and declarations.

The revisions to the memorandum are minor. They correct format, punctuation, or grammar errors, or clarify the text. Most of the revisions to the declaration are also made for these reasons. A few revisions to the declaration

add substantive statements that were inadvertently omitted and are consistent with the overall thrust of the declaration. The revisions are listed in the attachments.

Since the revisions in each document impact numerous pages, the Postal Service has refiled the entire document, rather than just the affected pages.

Respectfully submitted,

UNITED STATES POSTAL
SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Nan K. McKenzie

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3089 Fax -5402
May 18, 2005

Errata to Memorandum on Reconsideration
Revised May 18, 2005

Page		
3	Text of footnotes 1-4	Corrected the citations
4	Text of footnote 6	Corrected the citation
5	Second line	Added footnote citing Governors' Decision
9	Line 6	Deleted extra period
11	Second last line	Replaced "company" with "industry"
12	Lines 4-5	Replaced ". The" after savings with ", and the" ; added "with three of" after NSA.
	Line 5	Added period after Discover; deleted "and" and capitalized "its"
	Line 7	Replaced "has" with "have"
13	Second paragraph, last line	Replaced "provided " with "provides"
14	Last paragraph, first line	Replaced "case of" with "cases of other"
14	Line 4	Added "For example," before "The courts"
16	Second paragraph, first line	Replaced "Among" with "One of"
17	Last paragraph, line 5	Add "Act" after "Reorganization"
18	First paragraph, line 5	Added "raised by" after "issues"
	line 6	Added comma after "precedent"
	lines 7-8	Replaced "standard that. It" with "standard that it"
19	First paragraph, line 5	Replaced "risk" with "risks"
	Second paragraph, line 5	Replaced "this" with "these"
20	First paragraph, line 2	Replaced "terms: he contract" with "terms. The contract"
21	First paragraph	Added commas after "i.e." and "terms"

Page

23	Second paragraph, line 1	Deleted “the” before “Bank One”
25	First paragraph, last sentence	Deleted “, as we have discussed elsewhere in this memorandum,”
27	Last paragraph, line 1	Deleted “then”
28	First paragraph, line 4	Deleted apostrophe after Governors
	line 6	Added cite
	Second paragraph, line 3	Replaced “case” with “cases”
	Third paragraph, line 4	Deleted “will”

Errata to Declaration of Michael K. Plunkett
Revised May 18, 2005

The revised declaration increases the left margin to approximately 1". It also corrects the format glitch that lead to the table on page 20 to overlap with the text of paragraph 66.

Other specific errata are noted below.

Paragraph	Line	
3	8	Added comma after "volumes" and deleted comma after "developed"
5	2-3	Replaced "negotiated more and more" with gains experience in negotiating"
11	2	Deleted comma after process
12	3	Deleted parentheses
	next to last	Deleted "ed" from "maintain"
24	2	Added "Mail" to "First-Class"
33	text of footnote 1; second line	Added comma after "scores"
37	second last	Deleted "a" and added "purposes" after "marketing"
48	last	Added a period after "cards"
49	last	Replaced "volume data" with "statements"
51	last	Deleted "current" and added at the end "over the next several years." Also added sentence "We checked Bank One's operational mail volume against the forecast derived above and found that the two were consistent."
52	last	Added period after "rate"
53	2	Moved "for the model" to the beginning of the sentence

Paragraph	Line	
56	last	Added the sentence "We checked Bank One's forecast using this approach."
60	1	Deleted "the" after "within"
62	1	Replaced "analysis" with "analyses"
	4	Replaced "outweigh" with "outweighs"
68	3	Added "become" after "have"
71	Second last	Replaced "large" with "larger"
75	Last	Capitalized "After Rates"; also replaced "conserve" with "conservative"
84	4	Added "that" after "contract"
86	6	Deleted comma after "performing"
	Third last	Deleted "following"
88	3	Added cite to Brief of Bank One
89	3	Replaced ", and" with "because we"
	4	Added "partners" after NSA
	4	Replace "this upside this upside" with "the upside benefits"
	Last	Added "for" after "Postal Service"
90	1	Added commas after "that" and "basis"
96	2	Replaced "are" with "were"

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
May 18, 2005