

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Rate and Service Changes to Implement)
Baseline Negotiated Service Agreement)
with Washington Mutual Bank)

Docket No. MC2006-3

OFFICE OF CONSUMER ADVOCATE
INTERROGATORY TO WASHINGTON MUTUAL BANK
WITNESS MICHAEL RAPAPORT (OCA/WMB-T1-11)
(July 12, 2006)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits an interrogatory and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-5 are hereby incorporated by reference.

Respectfully submitted,

SHELLEY S. DREIFUSS
Director
Office of the Consumer Advocate

EMMETT RAND COSTICH
Attorney

901 New York Avenue, NW Suite 200
Washington, D.C. 20268-0001
(202) 789-6830; Fax (202) 789-6891
e-mail: costicher@prc.gov

OCA/USPS-T1-11. This interrogatory seeks information on the reaction of Washington Mutual Bank (WMB) to rate changes. Please refer to your revised testimony at page 6, lines 6-9, which seems to say that WMB reacts to rate changes by changing the proportions of First and Standard marketing volumes, subject to the constraints that the total number of marketing pieces remains the same and the marketing budget remains the same.

- a. Is this a correct restatement of your testimony? If not, please identify the errors in the restatement.
- b. Please describe how WMB will react to the R2006-1 rate changes when they take effect.