

UNITED STATES OF AMERICA
Before The
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Rate and Service Changes to Implement)
Baseline Negotiated Service Agreement)
With Bank of America Corporation)

Docket No. MC2007-1

OFFICE OF THE CONSUMER ADVOCATE INTERROGATORIES
TO UNITED STATES POSTAL SERVICE
WITNESS ALI AYUB
(OCA/USPS-T1-5-12)
(February 20, 2007)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-4, dated February 15, 2007, are hereby incorporated by reference

Respectfully submitted,

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OCA/USPS-T1-5. Please refer to your testimony at page 16, lines 9-14, which defines the read/accept rate

as the total number of Bank of America letter-rated First-Class Mail mailpieces that are read and accepted during their first pass through Postal Service mail sorting equipment, divided by the total number of letter-rated First-Class Mail mailpieces of Bank of America Mail that receive a first pass through Postal Service mail sorting equipment during the same quarter.

A similar definition of the read/accept rate applicable to Standard Mail mailpieces is found at page 21, lines 3-8

- a. Please explain how the Postal Service determines that a letter-rated First-Class Mail mailpiece (and Standard Mail mailpiece, if different) is read and accepted.
- b. For each of the following, please explain whether or not it is possible for a letter-rated First-Class Mail mailpiece (or Standard Mail mailpiece, if different) to be
 - i. read, but not accepted;
 - ii. accepted, but not read; and
 - iii. not read, and not accepted.
- c. For each of the following, please explain how the Postal Service determines that a letter-rated First-Class Mail mailpiece (and Standard Mail mailpiece, if different) is
 - i. read, but not accepted;
 - ii. accepted, but not read; and
 - iii. not read, and not accepted.

OCA/USPS-T1-6. Please refer to your testimony at page 16, lines 15-19, concerning the First-Class Mail baseline value of 96.8 percent. Please provide a page citation to

USPS LR-L-110 in Docket No. R2006-1 for the 96.8 percent accept rate. If you are unable to provide such a page citation, please show all calculations as to how you “derived” the 96.8 percent accept rate, providing citations to all figures used.

OCA/USPS-T1-7. Please refer to your testimony at page 21, lines 9-12, concerning the Standard Mail baseline value of 96.9 percent. Please provide a page citation to USPS LR-L-110 in Docket No. R2006-1 for the 96.9 percent accept rate. If you are unable to provide such a page citation, please show all calculations as to how you “derived” the 96.9 percent accept rate, providing citations to all figures used.

OCA/USPS-T1-8. Please refer to your testimony at page 16, lines 9-14, concerning the First-Class Mail baseline value of 96.8 percent. Please identify any baseline values other than the read/accept rate of 96.8 percent that were discussed during negotiations and rejected, and the reasons therefore.

OCA/USPS-T1-9. Please refer to your testimony at page 21, lines 2-8, concerning the Standard Mail baseline value of 96.9 percent. Please identify any baseline values other than the read/accept rate of 96.9 percent that were discussed during negotiations and rejected, and the reasons therefore.

OCA/USPS-T1-10. Please refer to your testimony at page 22, line 6-12, which references Table 2.3 of USPS LR-L-61 in Docket No. 2006-1. Also, please refer to Table 1 and Table 2, below.

Table 1
STANDARD MAIL

	Letters/Cards	Flats	Parcels	Total
Presort				5,359.5
Automation				57,208.3
ECR				32,995.7
Total	56,618.7	38,352.5	592.3	95,563.5

Table 2
STANDARD MAIL UAA

	Letters/Cards	Flats	Parcels	Total
Presort				578.3
Automation				4,477.4
ECR				1,052.9
Total	4,273.3	1,773.1	62.3	6,108.6

Source: Docket No. R2006-1, USPS LR-L-61, Tables 2.3 and 2.4
for Standard Mail

- a. For each cell in Table 1, above, please provide the volume of Standard Mail.
- b. For each cell in Table 2, above, please provide the volume of Undeliverable-As-Addressed (UAA) Standard Mail.
- c. Please explain and discuss what effect (if any) the shape of a Standard Mail mailpiece has on the volume and percent of Total UAA for Presorted, Automation, and ECR.

OCA/USPS-T1-11. Please refer to your testimony at page 22, lines 6-12.

- a. Please confirm that the weighted average UAA rate for Standard Mail Automation and ECR is 6.1 $((4,477.4 + 1,052.9) / (57,208.3 + 32,995.7))$ percent. If you do not confirm, please explain.
- b. Please confirm that the weighted average UAA rate of 6.1 percent for Standard Mail Automation and ECR was discussed during negotiations and rejected as an alternative to the system-wide average UAA rate of 6.4 percent. If you do not

confirm, please explain. Also, please identify any baseline values other than the system-wide average UAA rate of 6.4 percent that were discussed during negotiations and rejected, and the reasons therefore.

OCA/USPS-T1-12. Please refer to your testimony, Appendix A, "Input Data," Page 3, Lines [4], [5], [6], [7], and "Carrier Route," which refers to the 2006 Billing Determinants for First-Class Mail and Standard Mail automation letters.

- a. Please confirm that under the NSA, Standard Mail Automation Letters and ECR letters are eligible for discounts in Rate Schedules 630D and 630E. If you do not confirm, please explain.
- b. For Standard Mail, please provide the 2006 billing determinates for Automation Letters and ECR separately.