

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-T1-13-17)
(February 22, 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,

Shelley S. Dreifuss, Director
Office of the Consumer Advocate

Emmett Rand Costich, Attorney

901 New York Avenue, N.W.
Washington, D.C. 20268-0001
(202) 789-6833; Fax (202) 789-6891
e-mail: costicher@prc.gov

OCA/USPS-T1-13. Please refer to your testimony at page 9, lines 8-19.

- a. Please confirm that Bank of America (BAC) is currently a CONFIRM service subscriber. If you do not confirm, please explain.
- b. On what date did BAC become a CONFIRM service subscriber? Has BAC been a CONFIRM service subscriber continuously since that date? Please explain.
- c. Please confirm that BAC has already activated OneCode CONFIRM service. If you do not confirm, please explain. If you do confirm, please provide the date BAC activated OneCode CONFIRM service.

OCA/USPS-T1-14. Please refer to your testimony at page 9, lines 15-16, which states, "The CONFIRM markings will enable the Postal Service to capture the scan data needed to measure performance for read and accept rates."

- a. Please define and explain the term "markings" as used in this sentence.
- b. Please provide an example of a mailpiece scan record available to a CONFIRM service subscriber that does not utilize OneCode CONFIRM service, and explain the data contained in the mailpiece scan record.
- c. Please provide an example of a mailpiece scan record available to a CONFIRM service subscriber that utilizes OneCode CONFIRM service, and identify and explain the data contained in the mailpiece scan record.
- d. Please identify any differences in the data provided in the mailpiece scan records presented in response to parts b. and c., above.

- e. Please identify and explain how the data in the mailpiece scan record available to a CONFIRM service subscriber that utilizes OneCode CONFIRM service will permit the Postal Service to measure performance for read and accept rates.

OCA/USPS-T1-15. Please refer to your testimony at Appendix A, "First-Class Mail Processing Improvements," Page 10. For cells D9 to V13 (inclusive), please show all calculations, and provide citations to all sources, used to derive the BAC First-Class Mail Accept Rate Improvements.

OCA/USPS-T1-16. Please refer to your testimony at Appendix A, "Standard Mail Processing Improvements," Page 11. For cells D9 to V12 (inclusive), please show all calculations, and provide citations to all sources, used to derive the BAC Standard Mail Accept Rate Improvements.

OCA/USPS-T1-17. Please refer to your testimony at Appendix A, "Confirm Pricing," Page 16.

- a. Please confirm that the average number of scans per piece for origin and destination First-Class Mail is 1.85 and 2.76, respectively (see Docket No. R2006-1, Tr. 14/3949, response to OCA/USPS-T40-24(b)-(c)). If you do not confirm, please explain.
- b. Please confirm that the average number of scans per piece for "Other" (primarily Standard Mail) is 2.37 (see Docket No. R2006-1, Tr. 14/3949, response to OCA/USPS-T40-24(b)-(c)). If you do not confirm, please explain.

- c. Please confirm that the average number of scans per piece for First-Class Mail (both origin and destination) is 2.36 $((2,039,135,314 + 3,831,565,244) / (1,100,695,721 + 1,389,396,899))$. (See Docket No. R2006-1, Tr. 14/3949, response to OCA/USPS-T40-24(b)-(c).) If you do not confirm, please explain.
- d. Refer to Line [3]. Please explain the basis for the assumption of one scan per piece for First-Class Mail letters, and the reason for not using the average number of scans per piece for First-Class Mail (both origin and destination) of 2.36.
- e. Refer to Line [4]. Please explain the basis for the assumption of five scans per piece for Standard Mail letters, and the reason for not using the average number of scans per piece for Standard Mail of 2.37.