

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-T1-21-23)
(February 28, 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-T1-21. Please refer to your testimony at Appendix A, "Input Data," Page 3. Please refer to Lines [10] and [14], under the column Standard Mail. Please define and explain the terms "OneCode Electronic Notice" and "Standard Mail OneCode ACS Notice," and discuss the differences between the two.

OCA/USPS-T1-22. Please refer to your testimony, Appendix A, "City Delivery Unit Costs," Page 12.

- a. Under "Sources," you cite Excel file "CARMM05_LL_Detail_3RGrpCasing Pure.xls" from USPS-LR-L-67 in Docket No. R2006-1. Please confirm that the Excel file name is "CARMM05_KLDetail_3RGrpCasingPure.xls". If you do not confirm, please explain.
- b. In the electronic spreadsheet "Savings-CCS Delivery," please show the derivation of, or provide a citation to the Excel file in USPS-LR-L67, including the spreadsheet tab and cell reference for, the figure 315,540 in cellC20.
- c. In the electronic spreadsheet "Savings-CCS Delivery," please show the derivation of, or provide a citation to the Excel file in USPS-LR-L67, including the spreadsheet tab and cell reference for, the figure 1.0327 in cellC21.
- d. In the electronic spreadsheet "Savings-CCS Delivery," please confirm that in the absence of adjusting the amount in cell D12 to 325,837, the amount in cell D12 would have been 309,239. If you do not confirm, please explain.
- e. In the electronic spreadsheet "Savings-CCS Delivery," please explain the rationale for adjusting cellD12 to 325,837.

- f. In the electronic spreadsheet "Savings-CCS Delivery," please show the derivation of, or provide a citation to the Excel file in USPS-LR-L67, including the spreadsheet tab and cell reference for, the figure 263,998 in cell C2 4.
- g. In the electronic spreadsheet "Savings-CCS Delivery," please show the derivation of, or provide a citation to the Excel file in USPS-LR-L67, including the spreadsheet tab and cell reference for, the figure 1.213469719 in cell C2 5.
- h. In the electronic spreadsheet "Savings-CCS Delivery," please confirm that the amount in cell D14 should be 320,354. If you do not confirm, please explain.
- i. In the electronic spreadsheet "Savings-CCS Delivery," please explain the rationale for not adjusting cell D14 to 320,354.

OCA/USPS-T1-23. Please refer to your testimony, Appendix A, "Rural Delivery Unit Costs," Page 13.

- a. Please refer to the electronic spreadsheet "Savings-RCS Delivery." In column (1) "Letters," please confirm that the volume divisor used to derive the Presort Unit Cost of \$0.0451 in cell D17 is 2,612,095. If you do not confirm, please explain and provide a citation to the Excel file in USPS-LR-L5, including the spreadsheet tab and cell reference for the correct divisor. If you do confirm, please provide a citation to the Excel file in USPS-LR-L5, including the spreadsheet tab and cell reference for the figure 2,612,095.
- b. Please refer to the electronic spreadsheet "Savings-RCS Delivery." In column (5) "DPS," please confirm that the volume divisor used to derive the Presort Unit Cost of \$0.0156 in cell G17 is 10,358,772. If you do not confirm, please explain

and provide a citation to the Excel file in USPS-LR-L5, including the spreadsheet tab and cell reference for the correct divisor. If you do confirm, please provide a citation to the Excel file in USPS-LR-L5, including the spreadsheet tab and cell reference for the figure 10,358,772.