

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-T1-41-43)
(March 16, 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-T1-41. Please refer to your response to OCA/USPS-T1-6, and the Excel file, "Weighted average read rates.xls." In the column "USPS Modeled Acceptance Rate (%)," cell E10 contains the following formula used to derive the figure 97.29%:
 $=0.2103*0.961+0.7897*0.9761$.

- a. Please confirm that the weighting factor of 0.2103 represents the percent of automation letters to be processed as "Inc Sec 1 Pass Auto" (see USPS-LR-L-110, tabs AUTO MAADC MODEL, AUTO AADC MODEL, AUTO 3-DIGIT MODEL, and AUTO 5-DIGIT MODEL). If you do not confirm, please explain.
- b. Please explain the rationale for the weighting factor of 0.2103 applied to the acceptance rate of 96.1 percent for "Inc Sec 1 Pass Auto."
- c. Please confirm that the weighting factor of 0.7897 represents the percent of automation letters to be processed as "Inc Sec 2 Pass Auto" (see USPS-LR-L-110, tabs AUTO MAADC MODEL, AUTO AADC MODEL, AUTO 3-DIGIT MODEL, and AUTO 5-DIGIT MODEL). If you do not confirm, please explain.
- d. Please explain the rationale for the weighting factor of 0.7897 applied to the acceptance rate of 97.61 percent for "Inc Sec 2 Pass Auto – Pass 1."

OCA/USPS-T1-42. Please refer to your response to OCA/USPS-T1-6, and USPS-LR-L-110, under the AUTO MAADC MODEL tab.

- a. Please confirm that the accept rate (0.9616) for Mixed AADC letters fed at the "Out Sec Auto" sort is calculated from volumes of letters that previously received an "Out Prim Auto" sort plus volumes of Mixed AADC letters for which the "Out

- Sec Auto” sort will be their first sort. If you do not confirm, please explain how the data were collected for “pure” Mixed AADC volumes.
- b. Please confirm that Mixed AADC letters fed at the “Inc MMP Auto” sort consist of Mixed AADC letters that previously received an “Out Sec Auto” sort and letters for which the “Inc MMP Auto” sort will be their first sort. If you do not confirm, please explain how the data were collected for “pure” Mixed AADC volumes.
 - c. Please confirm that Mixed AADC letters fed at the “Inc SCF/Prim Auto” sort consist of Mixed AADC letters that previously received an “Out Sec Auto” or “Inc MMP Auto” sort and letters for which the “Inc SCF/Prim Auto” sort will be their first sort. If you do not confirm, please explain how the data were collected for “pure” Mixed AADC volumes.
 - d. Please confirm that Mixed AADC letters fed at the “Inc Sec Auto” sort consist of Mixed AADC letters that previously received an “Out Sec Auto,” “Inc MMP Auto,” or “Inc SCF/Prim Auto” sort and letters for which the “Inc Sec Auto” sort will be their first sort. If you do not confirm, please explain how the data were collected for “pure” Mixed AADC volumes.

OCA/USPS-T1-43. Please refer to your response to OCA/USPS-T1-6, and the Excel file, “Weighted average read rates.xls,” in which you calculated the weighted average read rates for Bank of America’s First-Class Mail and Standard Mail automation letters.

- a. Please confirm that the “USPS Modeled Acceptance Rates (%)” used to calculate Bank of America’s First-Class Mail and Standard Mail automation letter

read rates were obtained from Docket No. R2005-1, USPS-LR-K-68. If you do not confirm, please explain.

- b. Please confirm that the volume data used to estimate the “USPS Modeled Acceptance Rates (%)” were developed in AP 11 of FY 1999. If you do not confirm, please explain.