

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

Rate and Service Changes to Implement )  
Baseline Negotiated Service Agreement ) Docket No. MC2006-3  
With Washington Mutual Bank )

OFFICE OF CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS ALI AYUB (OCA/USPS-T1-34)  
(July 12, 2006)

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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 request for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-5 are hereby incorporated by reference.

Respectfully submitted,

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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](mailto:costicher@prc.gov)

OCA/USPS-T1-34. This interrogatory seeks information that could be used to reduce financial risk to the Postal Service from the Washington Mutual Bank (WMB) NSA.

Please refer to your testimony, Appendix A, the following charts entitled “Net Increase in USPS Contribution and Total WMB Discounts” for Years 1, 2, and 3 of the WMB NSA, and the accompanying electronic Excel file “OCA Exh2\_Panzar Test-WMB.” In Year 1, for volumes up to 551 million, please confirm that the Postal Service will not lose First-Class Mail contribution under the WMB NSA, according to the Panzar test. If you do not confirm, please explain, and show all calculations and all sources used.

