

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

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS AYUB TO INTERROGATORIES OF THE OFFICE OF CONSUMER
ADVOCATE (OCA/USPS-T1-5-9, 11-12)
(March 9, 2007)**

The United States Postal Service hereby provides the response of witness Ayub to the following interrogatories of the Office of Consumer Advocate: OCA/USPS-T1-5-9, 11-12, filed on February 20, 2007. The interrogatories are stated verbatim and are followed by the response. The Postal Service's response to OCA/USPS-T1-10 will be forthcoming.

On March 2, 2007, the Postal Service filed a partial objection to interrogatories OCA/USPS-T1-8, 9, and 11(b). Accordingly, partial answers to OCA/USPS-T1-8, 9, and 11(b) are included in this response.

UNITED STATES POSTAL SERVICE

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS AYUB TO
INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE**

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.

RESPONSE:

(a) The term “accepted” in the context of this NSA refers to the volume of mailpieces that are presented to the Postal Service for mailing for which postage is paid. Data on the volume of mail that is presented and therefore “accepted” by the Postal Service will be recorded and reported using Seamless Acceptance. As described in my testimony, Seamless Acceptance is a computerized Web-based system of hardware, software and protocols, currently under development by the Postal Service, that, among other things, automates the presentment of postage statement data and identifies the rate categories and total volumes for each unique mailing. See USPS-T-1, at 9-10.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS AYUB TO INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE

The term “read” in the context of this NSA refers to the volume of mailpieces that are accepted by the Postal Service and are processed by the Postal Service’s automated letter mail processing equipment. Mailpieces that cannot be read (i.e., processed by the Postal Service’s automated letter mail processing equipment) must be diverted to manual operations for processing.

b) Please see my responses to parts (i) through (iii) below:

- i. It is not possible for a mailpiece to be read but not accepted. Please see my response to part (a) above.
- ii. It is possible for a mailpiece to be accepted but not read. Please see my response to part (a) above. This might happen if the address quality of a particular mailpiece is poor or for a variety of other reasons, as described in USPS-T-22 in Docket No. R2006-1.
- iii. It is not possible for a mailpiece to be “not read” and “not accepted.”

c) Please see my responses to (i) through (iii) below:

- i. It is not possible for a mailpiece to be read but not accepted. Therefore, the Postal Service cannot determine whether a mailpiece is read, but not accepted.
- ii. The number of pieces accepted is the number of mailpieces for which postage is paid. The number of pieces read is the number of mailpieces for which there is scan data available. For example, if the Postal Service “accepts” 100 pieces of mail and there is only scan data for 98 pieces of mail, the read rate for that mail is 98 percent.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS AYUB TO
INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE**

iii. It is not possible for a mailpiece to be “not read” and “not accepted.”

Therefore, the Postal Service cannot determine whether a mailpiece is to
be “not read” and “not accepted.”

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS AYUB TO
INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE**

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.

RESPONSE:

The baseline value (i.e., accept rate) for BAC’s First-Class Mail of 96.8 percent is an average of system-wide accept rates weighted for BAC’s actual mail mix. The calculated baseline value of 96.8 percent is derived from the accept rates identified in USPS LR-L-110 in Docket No. R2006-1, weighted according to BAC’s specific mail mix. I relied on the accept rates shown under the “ACCEPT” tab in USPS-LR-L-110 as the basis for calculating the BAC specific baseline value of 96.9 percent. The specific calculations are provided in the attached worksheet, “Weighted average read rates w-sources.xls.”

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS AYUB TO
INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE**

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.

RESPONSE:

The baseline value (i.e., accept rate) for BAC’s Standard Mail of 96.9 percent is an average of system-wide accept rates weighted for BAC’s actual mail mix. The calculated baseline value of 96.9 percent is derived from the accept rates identified in USPS LR-L-110 in Docket No. R2006-1, weighted according to BAC’s specific mail mix. I relied on the accept rates shown under the “ACCEPT” tab in USPS-LR-L-110 as the basis for calculating the BAC specific baseline value of 96.9 percent. The specific calculations are provided in the attached worksheet, “Weighted average read rates w-sources.xls.”

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS AYUB TO
INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE**

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.

RESPONSE:

Because this is a performance based agreement, it made sense to both parties to use actual values for baselines. Because we believe that the Postal Service's system-wide average values, reweighted to reflect BAC's actual mail mix, offer the best available evidence of the BAC-specific baseline read/accept rate, we did not discuss any alternative way to estimate this value.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS AYUB TO INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE

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.

RESPONSE:

The baseline values that were considered as alternatives to the Standard Mail baseline value of 96.9 percent are included in the range of “accept” rates identified in USPS-LR-L-110 on the Tab “ACCEPT”. The Postal Service believes that the baseline value of 96.9 percent, which represents the weighted-average read/accept rate based on BAC’s specific mail mix, is the best available proxy for BAC’s baseline value.

Because this is a performance based agreement, it made sense to both parties to use actual values for baselines. Because we believe that an average of the USPS system-wide values, weighted to reflect the BAC-specific mail mix, provides the best available evidence of the BAC-specific Standard Mail baseline value, we did not discuss any others.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS AYUB TO
INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE**

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.

RESPONSE:

a) Confirmed for the volumes presented.

b) On March 2, 2007, the Postal Service filed a partial objection to this interrogatory (OCA/USPS-T1-11(b)) to the extent that it seeks the disclosure of information that does not relate to the factual bases supporting the baseline values chosen by the co-proponents. See Partial Objection of the United States Postal Service to Interrogatories OCA/USPS-T1-8, 9, AND 11(b). Accordingly, we provide the response below.

The weighted average of 6.1 percent for Standard Mail Automation and ECR letters was not chosen by the co-proponents as an alternative to the system-wide average UAA rate of 6.4 percent because ECR mail accounts for only 0.1 percent of BAC's total Standard Mail volume, a much smaller share than the national average for all Standard Mail. Similarly, the parties did not consider using 7.8 percent, which is the UAA rate of Automation mail of all shapes.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS AYUB TO
INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE**

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.

RESPONSE:

- a) Confirmed.
- b) Please see the spreadsheet under the Tab "InputsData-Volumes, UAA Costs" which appears on page 4 of "Appendix A" to my testimony. The requested information may be found in the table "2006 Billing Determinants" and in the table below.

RATE CATEGORY VOLUME PERCENT OF TOTAL

RATE CATEGORY	VOLUME	PERCENT OF TOTAL
Basic AADC Auto LTR	78,650,684	4.23%
Basic MAADC Auto LTR	38,289,718	2.06%
3D Auto LTR	927,757,876	49.85%
5D Auto LTR	814,263,700	43.75%
ECR	2,193,803	0.12%
Total	1,861,155,781	100.00%

**UAA Volume Tables
FY 2004**

Table 2.1
CFS Control Factor Derivation
Delivery Unit Route Survey
(Volume Reported in Millions)

[A]	[B]	[C]	[D]
Row	Disposition	Uncontrolled Volume (1)	Controlled To CFS Volume
1	Sent To CFS	1,942.5	2,274.5 (2)
2	Hand Forwards	93.7	109.7 (2)
3	RTS Non-ACS	1,280.0	1,280.0
4	RTS ACS	117.2	117.2
5	Wasted	5,920.1	5,920.1
6	PKR	2,332.5	2,332.5
7	Total	11,685.9	12,033.9
8	Total UAA	9,353.4	9,701.5
9	FCS FY 04 Database Volume less Rekeys, No- Record Mail & Nixie Mail (3)	----->	2,274.5
10		CFS Factor	1.17 (4)

Notes:

- (1) From the Delivery Unit Route Survey.
- (2) Uncontrolled volume multiplied by CFS factor.
- (3) Refer to FCS database in Appendix C.
- (4) FCS volume in row 9, col D divided by Sent-To-CFS volume row 1, col C.

Table 2.2
Disposition of Volume of UAA Mail by Class of Mail and Location
(Volume Reported in Millions)

Disposition at Delivery Units (1)

<u>Disposition</u>	First Class		Periodicals		Standard		Package Services		Other Classes		Total	
	Volume	Percent	Volume	Percent	Volume	Percent	Volume	Percent	Volume	Percent	Volume	Percent
Carrier Endorsed / Returned to Sender	1,245.3	37.5%	42.2	20.9%	84.2	1.4%	4.9	14.6%	20.6	44.8%	1,397.2	14.4%
Hand Forwards	95.6	2.9%	3.7	1.8%	7.5	0.1%	0.1	0.2%	2.9	6.3%	109.7	1.1%
Sent to CFS	1,979.4	59.6%	156.0	77.3%	111.2	1.8%	5.4	15.8%	22.5	48.9%	2,274.5	23.4%
Wasted	0.0	0.0%	0.0	0.0%	5,896.5	96.7%	23.5	69.4%	0.0	0.0%	5,920.1	61.0%
Total	3,320.3	100.0%	201.9	100.0%	6,099.4	100.0%	33.9	100.0%	46.0	100.0%	9,701.5	100.0%

Disposition at CFS Units (2)

<u>Disposition</u>	First Class		Periodicals		Standard		Package Services		Other Classes		Total	
	Volume	Percent	Volume	Percent	Volume	Percent	Volume	Percent	Volume	Percent	Volume	Percent
Forwarded	1,713.7	86.6%	101.6	65.1%	25.3	22.8%	3.4	64.3%	21.2	94.3%	1,865.4	82.0%
Returned to Sender	254.1	12.8%	0.2	0.1%	28.5	25.7%	0.2	3.9%	1.3	5.7%	284.4	12.5%
Wasted	11.5	0.6%	54.2	34.7%	57.3	51.6%	1.7	31.8%	0.0	0.0%	124.7	5.5%
Total	1,979.4	100.0%	156.0	100.0%	111.2	100.0%	5.4	100.0%	22.5	100.0%	2,274.5	100.0%

Disposition at Delivery Units and CFS Units Combined

<u>Disposition</u>	First Class		Periodicals		Standard		Package Services		Other Classes		Total	
	Volume	Percent	Volume	Percent	Volume	Percent	Volume	Percent	Volume	Percent	Volume	Percent
Forwarded	1,809.3	54.5%	105.3	52.2%	32.9	0.5%	3.5	10.3%	24.1	52.4%	1,975.1	20.4%
Returned to Sender	1,499.4	45.2%	42.4	21.0%	112.7	1.8%	5.2	15.2%	21.9	47.6%	1,681.6	17.3%
Wasted	11.5	0.3%	54.2	26.8%	5,953.9	97.6%	25.2	74.5%	0.0	0.0%	6,044.8	62.3%
Total	3,320.3	100.0%	201.9	100.0%	6,099.4	100.0%	33.9	100.0%	46.0	100.0%	9,701.5	100.0%

Notes:

(1) Volumes by disposition are developed from the delivery unit route survey.

(2) Volume levels are developed from the delivery unit route survey. Disposition detail is developed from the *CFS Path Model*, Appendix C.

Table 2.3
Disposition of Volume of UAA Mail by Class of Mail / Rate Category
(Volume Reported in Millions)

	RPW - FY04		Total UAA		Final Disposition					
	Volume	Percent	Volume	Percent	Forwarded		Returned to Sender		Wasted	
					Volume	Percent	Volume	Percent	Volume	Percent
First-Class Mail										
Single-Piece	47,687.7	48.7%	1,210.2	36.4%	659.8	36.5%	550.3	36.7%	0.0	0.1%
Presorted	2,553.6	2.6%	176.0	5.3%	75.4	4.2%	99.8	6.7%	0.7	6.0%
Automation	47,685.1	48.7%	1,934.1	58.3%	1,074.1	59.4%	849.2	56.6%	10.8	93.9%
Total	97,926.4	100.0%	3,320.3	100.0%	1,809.3	100.0%	1,499.4	100.0%	11.5	100.0%
Periodicals										
Presorted	807.1	8.8%	12.9	6.4%	6.0	5.7%	3.3	7.8%	3.6	6.7%
Carrier Route	4,454.2	48.8%	76.8	38.1%	41.6	39.5%	14.2	33.4%	21.0	38.8%
Automation	3,874.0	42.4%	112.1	55.5%	57.7	54.8%	24.9	58.8%	29.5	54.5%
Total	9,135.3	100.0%	201.9	100.0%	105.3	100.0%	42.4	100.0%	54.2	100.0%
Standard Mail										
Presorted	5,359.5	5.6%	576.9	9.5%	7.1	21.7%	21.2	18.8%	548.6	9.2%
ECR	32,995.7	34.5%	1,052.3	17.3%	2.0	6.0%	9.9	8.8%	1,040.4	17.5%
Automation	57,208.3	59.9%	4,470.2	73.3%	23.8	72.3%	81.6	72.5%	4,364.8	73.3%
Total	95,563.5	100.0%	6,099.4	100.0%	32.9	100.0%	112.7	100.0%	5,953.9	100.0%
Package Services										
Parcel Post	114.4	10.1%	0.4	1.3%	0.2	4.9%	0.3	5.1%	0.0	0.0%
Parcel Select	261.2	23.1%	1.0	2.9%	0.8	22.2%	0.1	2.7%	0.1	0.3%
BPM	553.7	48.9%	30.1	88.7%	1.9	53.0%	3.0	58.8%	25.2	99.7%
Media/Library	202.6	17.9%	2.4	7.1%	0.7	19.9%	1.7	33.4%	0.0	0.0%
Total	1,131.9	100.0%	33.9	100.0%	3.5	100.0%	5.2	100.0%	25.2	100.0%
Other Classes										
International	843.8	36.0%	20.3	44.1%	13.6	56.2%	6.7	30.7%	0.0	0.0%
Priority	848.6	36.2%	6.0	13.0%	4.1	16.8%	1.9	8.9%	0.0	0.0%
USPS	529.3	22.6%	17.3	37.5%	5.8	24.1%	11.4	52.2%	0.0	0.0%
Free	71.1	3.0%	2.5	5.4%	0.7	2.9%	1.8	8.1%	0.0	0.0%
Express	54.1	2.3%	0.0	0.0%	0.0	0.0%	0.0	0.0%	0.0	0.0%
Total	2,347.0	100.0%	46.0	100.0%	24.1	100.0%	21.9	100.0%	0.0	0.0%
Grand Total	<u>206,104.1</u>		<u>9,701.5</u>		<u>1,975.1</u>		<u>1,681.6</u>		<u>6,044.8</u>	

Table 2.4
Disposition of Volume of UAA Mail by Class of Mail / Shape
(Volume Reported in Millions)

	RPW - FY04 (1)		Total UAA		Final Disposition					
	Volume	Percent	Volume	Percent	Forwarded		Returned to Sender		Wasted	
					Volume	Percent	Volume	Percent	Volume	Percent
First-Class Mail										
Letters/Cards	92,872.1	94.8%	3,165.1	95.3%	1,722.0	95.2%	1,432.3	95.5%	10.7	92.9%
Flats	4,565.0	4.7%	149.5	4.5%	83.2	4.6%	65.5	4.4%	0.8	7.1%
Mach. Parcels			2.2	0.1%	1.6	0.1%	0.6	0.0%	0.0	0.0%
Nonmach. Parcels			3.5	0.1%	2.5	0.1%	1.0	0.1%	0.0	0.0%
Total Parcels	489.2	0.5%	5.7	0.2%	4.1	0.2%	1.6	0.1%	0.0	0.0%
Total	97,926.4	100.0%	3,320.3	100.0%	1,809.3	100.0%	1,499.4	100.0%	11.5	100.0%
Periodicals										
Letters/Cards	170.2	1.9%	4.8	2.4%	1.5	1.4%	2.5	5.8%	0.9	1.6%
Flats	8,963.7	98.1%	195.4	96.8%	102.9	97.8%	40.0	94.2%	52.5	96.9%
Mach. Parcels			0.4	0.2%	0.3	0.3%	0.0	0.0%	0.1	0.2%
Nonmach. Parcels			1.3	0.6%	0.6	0.6%	0.0	0.0%	0.7	1.3%
Total Parcels	1.4	0.0%	1.7	0.8%	0.9	0.8%	0.0	0.0%	0.8	1.5%
Total	9,135.3	100.0%	201.9	100.0%	105.3	100.0%	42.4	100.0%	54.2	100.0%
Standard Mail										
Letters/Cards	56,618.7	59.2%	4,268.1	70.0%	20.2	61.6%	82.7	73.4%	4,165.1	70.0%
Flats	38,352.5	40.1%	1,770.5	29.0%	11.1	33.7%	24.2	21.5%	1,735.3	29.1%
Mach. Parcels			18.2	0.3%	0.8	2.3%	1.4	1.2%	16.1	0.3%
Nonmach. Parcels			42.6	0.7%	0.8	2.4%	4.4	3.9%	37.4	0.6%
Total Parcels	592.3	0.6%	60.8	1.0%	1.5	4.7%	5.8	5.1%	53.5	0.9%
Total	95,563.5	100.0%	6,099.4	100.0%	32.9	100.0%	112.7	100.0%	5,953.9	100.0%
Package Services										
Flats	281.6	24.9%	23.9	70.5%	2.2	63.8%	1.3	24.5%	20.4	80.8%
Mach. Parcels			0.7	2.2%	0.6	16.3%	0.2	3.4%	0.0	0.0%
Nonmach. Parcels			9.3	27.3%	0.7	19.8%	3.7	72.1%	4.8	19.2%
Total Parcels	850.4	75.1%	10.0	29.5%	1.3	36.2%	3.9	75.5%	4.8	19.2%
Total	1,131.9	100.0%	33.9	100.0%	3.5	100.0%	5.2	100.0%	25.2	100.0%
Other Classes										
Letters/Cards	1,066.8	45.5%	34.1	74.0%	16.1	66.5%	18.0	82.2%	0.0	0.0%
Flats	569.4	24.3%	9.8	21.2%	6.7	27.8%	3.0	13.8%	0.0	0.0%
Mach. Parcels			1.0	2.1%	0.6	2.6%	0.4	1.6%	0.0	0.0%
Nonmach. Parcels			1.2	2.7%	0.7	3.0%	0.5	2.3%	0.0	0.0%
Total Parcels	710.8	30.3%	2.2	4.8%	1.4	5.6%	0.9	4.0%	0.0	0.0%
Total	2,347.0	100.0%	46.0	100.0%	24.1	100.0%	21.9	100.0%	0.0	0.0%
Grand Total	<u>206,104.1</u>		<u>9,701.5</u>		<u>1,975.1</u>		<u>1,681.6</u>		<u>6,044.8</u>	

Notes:

(1) RPW detail is not available for machinable and non-machinable parcels.

Table 2.5
Hold Mail Volume

	Number (millions)	Average per Route
Current Holds on File	0.824	3.1
Current Hold Orders With End Dates	0.589	2.2
Average Current Hold Duration (1), (2)	n/a	11.1
Average Scheduled Hold Duration (1)	n/a	14.0
Total Accumulated Mail Pieces	25.010	30.3
Pieces Received per Hold per Day (1), (3)	n/a	3.6

Notes:

- (1) Average is based only on routes with holds.
- (2) Average includes holds without end dates.
- (3) Days include non-delivery days.

Weighted Average Read Rates-BoA Mail				
2006 Billing Determinants	Billing Determinants^{1/}		USPS Modeled Acceptance Rate (%)^{2/}	Weighted Average First-Class Mail^{3/}
	First-Class Mail	Standard Mail		
Automation Letters				
Mixed AADC	52,965,099	38,289,718	96.16%	5.04%
AADC	29,216,948	78,650,684	95.98%	2.77%
3-Digit	621,230,368	929,951,679	96.60%	59.33%
5-Digit	308,005,135	814,263,700	97.29%	29.63%
Totals	1,011,417,550	1,861,155,781		96.77%

Sources:

^{1/} Bank of America NSA Appendix A, sheet "Input Data-Volumes, Unit Costs"

^{2/} USPS-LR-L-110.xls, sheet "Accept"

^{3/} [First Class Mail Volume X USPS Modeled Acceptance Rate]

^{4/} [Standard Mail Volume X USPS Modeled Acceptance Rate]

Average Read Rate
Standard Mail ^{4/}
1.98%
4.06%
48.27%
42.57%
96.87%

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Matthew J. Connolly

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March 9, 2007