

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

**FOLLOW-UP INTERROGATORIES OF
AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS AYUB (APWU/USPS T1-4-9)
(May 1, 2007)**

Pursuant to Rules 25, 26, and 27 of the Rules of Practice, the American Postal Workers Union, AFL-CIO directs the following follow-up interrogatories to USPS witness Ali Ayub. If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

Darryl J. Anderson
Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

O'Donnell, Schwartz & Anderson, P.C.
1300 L Street NW Suite 1200
Washington, DC 20005-4126
Voice: (202) 898-1707
Fax: (202) 682-9276
DAnderson@odsalaw.com
JWood@odsalaw.com

APWU/USPS-T1-4 In your response to OCA/USPS-T1-35, you provided Worksheet IMB Scan Rate_#35.

- a) Please confirm that the scan rates provided in that worksheet are not calculated in the same way as those described in LR-L-110. If you can not confirm, please explain how they are the same.
- b) Please confirm that the scan rates provided in that worksheet are not calculated in the same way as specified in the BAC/USPS Negotiated Service Agreement submitted with this case. If you can not confirm, please explain how they are the same.
- c) Is there any way of knowing that all the pieces that are shown in the “piece-level electronic documentation” mentioned in point number three of your response were actually fed on any machine?
- d) Were the destinations of the pieces checked against the list of places that do not require DBCS sorts?
- e) To what does the #35 refer in the label of this worksheet?

APWU/USPS-T1-5 Please refer to the document attached to your response to OCA/USPS-T1-35 that you call the “Seamless Acceptance” power point used in a presentation by Pritha Mehra to the Major Mailers Association on April 17, 2007.

- a) The first page of that document indicates a date of February 20, 2007. To what group was this document presented in February and who presented it?
- b) Was this document used for any other presentations between February and April 17th? If so, to which groups and who was the presenter?
- c) Were the power point slides produced by Pritha Mehra?
- d) Pages 17 through 27 of that document are identified as “draft”. Please explain what is meant by draft in this instance.
- e) Were the pages identified as “draft” included in the April 17, 2007 presentation? Were they included in any other presentation?

APWU/USPS-T1-6 In the power point presentation entitled “Seamless Acceptance Pilot” that you provided in your response to OCA/USPS-T1-35, page 7 refers to mailpiece counts.

- a) Are the piece scans referred to there the same ones as were calculated from the data in IMB Scan_Rate#35? If not, can you identify the source of the scans discussed on page 7?
- b) There is reference to a 2% improvement in the scan rates since November. Is the 98% scan rate identified there the most current scan rate? What was the scan rate in November 2006?
- c) Please confirm that the scan rates presented in IMB Scan_Rate#35 includes scans from November 2006 through March 2007.

APWU/USPS-T1-7 Toward the end of your response to OCA/USPS-T1-35 you state “we believe that significant improvements in read/accept rates for bulk prebarcoded mail of the sort entered by BAC are unlikely to have occurred since 1999. Most of our R&D and investments in barcoding equipment upgrades since 1999 have been aimed at improving our read/accept rates for handwritten addresses and other low-quality addresses, and for development of the IMB with its additional data fields.”

- a) Are the read/accept rates presented in LR-L-110 only for “bulk prebarcoded mail”? Please identify where in the documentation (USPS LR-K-68 “Study Description”) the type of mail is described.
- b) If not, would any of the investments in barcoding equipment upgrades since 1999 have impacted the read/accept rates that are presented in LR-L-110?
- c) In preparing the proposed NSA, did the Postal Service inquire as to the improvements BAC and its vendors have undertaken to enhance their mail read/acceptance rates since 1999? If so, what were those improvements? If not, why not?

APWU/USPS-T1-8 Toward the end of your response to OCA/USPS-T1-35 you reference “the large-volume service bureaus that prepare the mail of BAC and its peers.”

- a) What percentage of BAC’s letter mail is prepared by BAC and what percentage is prepared by its contract service bureaus?
- b) Who are the service bureaus that prepare the BAC mail?

APWU/USPS-T1-9 In your response to VP/USPS-T1-26 (c) you state that you “understand that there is a direct correlation between MERLIN accept rates and the read rates of automation mail.”

- a) Is that understanding based on the information that is provided on page 8 of the document entitled “Seamless Acceptance Pilot” presented as part of your answer to OCA/USPS-T1-35? If not, please identify what your understanding is and what that understanding is based on.
- b) Did the Postal Service check the MERLIN accept rates of BAC or any of the service bureaus that prepare the BAC mail in its work in preparation for this NSA? If so, what did those read rates show? If not, why not?