

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-T1-22-24)  
(May 11, 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 interrogatories and requests 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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OCA/USPS-T1-22. This interrogatory seeks information to clarify the value of the Washington Mutual Bank (WMB) NSA. Please refer to your testimony, Appendix A, page 7 (REVISED April 11, 2006), and the \$0.035 and \$0.040 discount tiers for Years 1, 2, and 3. Please explain why there are two separate volume blocks for each discount, i.e., a separate 20 million block and 15 million for the \$0.035 discount tier, and a separate 50 million and another 50 million for the \$0.040 discount tier.

OCA/USPS-T1-23. This interrogatory seeks to understand the basis for the Postal Service's estimate of future postage expenditures by Washington Mutual Bank (WMB). Please refer to your testimony at page 24, lines 2-7. Please explain the basis for your understanding of "WMB's historical marketing budgets."

OCA/USPS-T1-24. This interrogatory seeks information on the proposed Data Collection Plan (DCP) for the Washington Mutual Bank (WMB) NSA. Please refer to your testimony, Appendix C, "WMB Financial Services NSA Proposed Data Collection Plan." Please identify and explain the rationale for any material changes in the proposed DCP from the Data Collection Plan recommended by the Commission in Docket No. MC2004-3, the BankOne NSA.