

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-T1-24-30)
(March 2, 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-T1-24. Please refer to your testimony at page 16, lines 8-9, which references a baseline value read/accept rate of 96.8 percent for First-Class Mail automation letters.

- a. Please provided the read/accept rate for First-Class Mail automation letters for FY 2006, or the most recent year available.
- b. In what fiscal year was the data collected that is used to estimate the baseline value read/accept rate of 96.8 percent for First-Class Mail automation letters?

OCA/USPS-T1-25. Please refer to your testimony at page 21, lines 1-2, which references a baseline value read/accept rate of 96.9 percent for Standard Mail Regular automation and ECR letters.

- a. Please provided the read/accept rate for Standard Mail Regular automation and ECR letters for FY 2006, or the most recent year available.
- b. In what fiscal year was the data collected that is used to estimate the baseline value read/accept rate of 96.9 percent for Standard Mail Regular automation and ECR letters?

OCA/USPS-T1-26. Please refer to your testimony at page 15, lines 15-19, which states, in part:

read and accept rates are likely to depend primarily on the generation of barcoding protocol used by the mailer and the scanning equipment used by the Postal Service—factors that are unlikely to generate wide mailer-to-mailer variations.

Given the statement quoted above, why do you expect or believe Bank of America (BAC) will be able to improve the read/accept rate for its First-Class Mail and Standard Mali letters? Please explain.

OCA/USPS-T1-27. Please refer to your testimony at page 16, lines 8-9, and page 21, lines 1-2, which reference the baseline value read/accept rates for First-Class Mail and Standard Mali letters, respectively. Also, please refer to the testimony of BAC witness Jones (BAC-T-1) at page 18, lines 6-10, which states, in part:

The actual level of improvement will depend in large part on . . . (3) the performance of the Postal Service's own processes (e.g., the read and accept rate of its barcode reading equipment), which are largely beyond our control.

- a. For First-Class Mail and Standard Mail, separately (if different), please rank order and discuss the 10 most important factors "related to the performance of the Postal Service's own processes" that cause the failure of barcodes on automation letters to be read and accepted.
- b. For First-Class Mail and Standard Mail, separately (if different), please explain and discuss how the Postal Service intends to eliminate or address each of the factors identified in part a. of this interrogatory, above, in order to improve the read and accept rate of barcodes on automation letters.
- c. For First-Class Mail and Standard Mail, separately (if different), please identify and discuss the specific additional mail processing steps that are caused by the failure of barcodes on automation letters to be read and accepted.

- d. For First-Class Mail and Standard Mail, separately (if different), please identify and provide the unit costs associated with the specific additional mail processing steps identified in part c. of this interrogatory, above.

OCA/USPS-T1-28. Please refer to your testimony at page 16, lines 8-9, and page 21, lines 1-2, which reference the baseline value read/accept rates for First-Class Mail and Standard Mail letters, respectively.

- a. For First-Class Mail and Standard Mail, separately (if different), please rank order and discuss the 10 most important factors related to mail preparation, performance of the mailer, etc., that you believe cause the failure of barcodes on automation letters to be read and accepted.
- b. For First-Class Mail and Standard Mail, separately (if different), please explain and discuss what you believe the mailer could do to eliminate or address each of the factors identified in part a. of this interrogatory, above, in order to improve the read and accept rate of barcodes on automation letters.

OCA/USPS-T1-29. Please refer to your testimony at page 24, lines 15-26, and page 25, lines 1-20, which reference the data collection plan for the NSA. For each Rate Schedule 630A through E, please confirm that the Postal Service will report as part of the data collection plan the amount of discounts paid to BAC. If you do not confirm please explain.

OCA/USPS-T1-30. Please refer to your testimony at page 25, lines 12-13, which references calculation of forward and return rates for BAC's First-Class Mail volumes, and calculation of a UAA rate for BAC's Standard Mail volumes. Please confirm that the Postal Service will also calculate separate read and accept rates for BAC's First-Class Mail volumes and Standard Mail volumes. If you do not confirm, please explain.