

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 INTERROGATORY
TO UNITED STATES POSTAL SERVICE
WITNESS ALI AYUB
(OCA/USPS-T1-47)
(April 5, 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 an interrogatory and request 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-T1-47. Please refer to your testimony at page 7, lines 21-23, where it states that Bank of America (BAC) “also agrees to use Four-State Barcodes on BRM, QBRM, and CRM pieces enclosed in bills, invoices and other mailpieces mailed by the Bank,” citing the NSA at Section III.G.

- a. Please confirm that BAC receives approximately 450 million BRM, QBRM, and CRM pieces annually. If you do not confirm, please explain.
- b. Please confirm that under the NSA, BAC will not receive any discounts for improvements in read/accept rates resulting from the use of Four-State Barcodes on BRM, QBRM, and CRM pieces. If you do not confirm, please explain.
- c. Given the requirement to use Four-State Barcodes on BRM, QBRM, and CRM pieces, please explain the rationale for not offering discounts for improvements in read/accept rates on such BRM, QBRM, and CRM pieces.