

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 INTERROGATORY OF THE OFFICE OF CONSUMER  
ADVOCATE (OCA/USPS-T1-17, PART (E))  
(April 6, 2007)**

The United States Postal Service hereby provides the response of witness Ayub to the following interrogatory of the Office of Consumer Advocate: OCA/USPS-T1-17, part (e), filed on February 22, 2007. The interrogatory is stated verbatim and is followed by the response.

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno  
Chief Counsel, Customer Programs

Frank R. Heselton  
Matthew J. Connolly

475 L'Enfant Plaza, S.W.  
Washington, D.C. 20260-1135  
(202) 268-8582; Fax -5418

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

**OCA/USPS-T1-17.** Please refer to your testimony at Appendix A, "Confirm Pricing," Page 16.

- a. Please confirm that the average number of scans per piece for origin and destination First-Class Mail is 1.85 and 2.76, respectively (see Docket No. R2006-1, Tr. 14/3949, response to OCA/USPS-T40-24(b)-(c)). If you do not confirm, please explain.
- b. Please confirm that the average number of scans per piece for "Other" (primarily Standard Mail) is 2.37 (see Docket No. R2006-1, Tr. 14/3949, response to OCA/USPS-T40-24(b)-(c)). If you do not confirm, please explain.
- c. Please confirm that the average number of scans per piece for First-Class Mail (both origin and destination) is 2.36  $((2,039,135,314 + 3,831,565,244) / (1,100,695,721 + 1,389,396,899))$ . (See Docket No. R2006-1, Tr. 14/3949, response to OCA/USPS-T40-24(b)-(c).) If you do not confirm, please explain.
- d. Refer to Line [3]. Please explain the basis for the assumption of one scan per piece for First-Class Mail letters, and the reason for not using the average number of scans per piece for First-Class Mail (both origin and destination) of 2.36.
- e. Refer to Line [4]. Please explain the basis for the assumption of five scans per piece for Standard Mail letters, and the reason for not using the average number of scans per piece for Standard Mail of 2.37.

**RESPONSE:**

- e. The assumption of five scans was based on the estimated number of maximum scans for a Standard Mail mail piece. In the pricing structure proposed by the Postal Service in Docket No. R2006-1, this number was a necessary component in forecasting the total revenue from a CONFIRM customer. However, the pricing structure for CONFIRM recommended by the Commission in its Opinion and Recommended Decision in Docket No. R2006-1 eliminates the need to estimate the number of scans to estimate revenue from CONFIRM.

## 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.

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Matthew J. Connolly

475 L'Enfant Plaza, S.W.  
Washington, D.C. 20260-1135  
(202) 268-8582; Fax -5418  
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