

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
FOLLOW-UP INTERROGATORY TO
UNITED STATES POSTAL SERVICE
WITNESS ALI AYUB
(OCA/USPS-T1-48)
(May 1, 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,

Shelley S. Dreifuss, Director
Office of the Consumer Advocate

Emmett Rand Costich, Attorney

901 New York Avenue, N.W.
Washington, D.C. 20268-0001
(202) 789-6833; Fax (202) 789-6891
e-mail: costicher@prc.gov

OCA/USPS-T1-48. Please refer to your response to interrogatory OCA/USPS-T1-35.

- a. Please provide copies of all documents that contain or discuss possible or actual reasons for the variations in scan rates (among individual mailings) shown in the Excel attachment to the response. If no such documents exist, please provide an explanation for these variations in scan rates.
- b. Please provide copies of the documents or files containing the data used to calculate the scan rates for individual mailings.
- c. Please provide the basis for the statement,

High profile pilot studies of this kind are often viewed by the participants as a chance to showcase both the new technology and the skill of the study participants at mastering it. For this reason, participants in studies of this kind often devote more resources to maintenance, alignment, cleaning and calibration than might be expected with a mature technology used in the ordinary course of business. Needless to say, special efforts of this kind can hardly be regarded as good proxies for Before Rates performance in an NSA.

- d. Does (will) BAC use either Mailer A or Mailer B to prepare its mailings?¹

¹ "BAC uses the same handful of third-party vendors to barcode its mail as do other large mailers." Comments of Bank of America Corporation in Response to Notice of Inquiry No. 1, April 17, 2007, at 4.