

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Complaint of Capital One Services, Inc.)

Docket No. C2008-3

PUBLIC REPRESENTATIVE INTERROGATORY TO
UNITED STATES POSTAL SERVICE
(PR/USPS-15)
September 3, 2008

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Public Representative hereby submits an interrogatory and request for production of documents. Instructions included with Public Representative interrogatories PR/USPS-1-7 dated August 11, 2008, are hereby incorporated by reference.

Respectfully submitted,

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Public Representative

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PR/USPS-15. Please refer to PRC-LR-1, "Workpapers for MC2007-1 Opinion and Recommended Decision (Released from Protective Conditions)," and PRC Op. MC2007-1 (Released from Protective Conditions), which relies on the analysis in PRC-LR-1, where it states, at page 2:

[1006] Applying the most recent read/accept rates, assuming that Bank of America continues to perform at systemwide average levels, and generally accepting the Postal Service's estimate relating to the other four incentive discounts, the financial analysis reveals that the Postal Service will lose up to \$45.8 million from the Agreement. Even in the unlikely event that Bank of America achieves perfect read/accept rates, the Postal Service will lose more than \$25 million from the Agreement.

Please confirm that the Postal Service concludes, as the Commission did, that the "Postal Service will lose more than \$25 million . . . up to \$45.8 million from the Agreement." If you do not confirm, please provide a detailed explanation of any disagreement with the Commission's financial analysis in PRC-LR-1, and provide any Postal Service financial analysis (in electronic form), and any other analysis, that supports your explanation and/or shows the areas of disagreement with the Commission's financial analysis.