Q. In reference to the evidence of Earl Ludlow, page 54, line 20; please provide a sample of estimates of call volumes by day and by hour, using historical data, for the period 2000 to 2002.

A. Attachments A and B are copies of call volume forecasts for the weeks of October 22, 2001, and October 21, 2002 respectively.

These reports represent a forecast of calls expected for each of the three work groups (Inquiry, Blended and Credit) based on historical call volume patterns. While all agents in the Call Centre have now been trained to answer all types of calls, the Company continues to forecast each group separately, which provides more information on call types and thus greater flexibility in staffing.

The forecast provides the expected number of calls for each half hour period. To obtain the total number of calls expected for each day, the total of each group (Inquiry, Blended and Credit) must be added together. For instance, for Monday, October 22, 2001, the expected total call volume for the day was 493 + 415 + 471 or 1,379 calls.

Based on these call volumes along with the average handle time, required service level and the occupancy rate, the staffing forecast is produced for each half hour period; giving us the number of employees needed for each shift during the day and for each day of the week. The average handle time is the average length of time the CAR spends with each customer. The required service level is in our case 80% within 40 seconds. The occupancy rate is how productive we expect the CARs to be in answering calls. Our forecasting uses an occupancy rate of 85%, meaning that out of a 7.5-hour day, we expect the CARs to be on the phone for 6 hours.

Attachment C is a graph indicating forecast call volumes and actual call volumes for the week of October 21, 2002, which indicates the accuracy of the forecasting procedure.