

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Regulatory Commission
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COMPLAINT OF CAPITAL ONE
SERVICES, INC.

Docket No. C2008-3

**DOCUMENT REQUESTS OF CAPITAL ONE SERVICES, INC.
TO THE UNITED STATES POSTAL SERVICE (COS/USPS-1-17)**
(August 8, 2008)

Pursuant to Rules 25 through 27 of the Rules of Practice of the Postal Regulatory Commission, Capital One Services, Inc. ("Capital One") submits the following requests for production of documents to the United States Postal Service (the "Postal Service"). Instructions and Definitions applicable to these Document Requests are contained in the Interrogatories of Capital One Services, Inc. to the United States Postal Service (COS/USPS-1-11), filed August 8, 2008, and are hereby incorporated by reference.

Respectfully submitted,

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DOCUMENT REQUEST COS/USPS-1

Please provide all documents that relate to any part of Interrogatory COS/USPS-1 or to the Postal Service's Response to any part of Interrogatory COS/USPS-1.

DOCUMENT REQUEST COS/USPS-2A

Please provide all documents that relate to any knowledge the Postal Service has gained from regulatory reviews of the Bank of America NSA.

DOCUMENT REQUEST COS/USPS-2B

Please provide all documents that relate to all "internal reviews of the BAC NSA," including copies of reports, audits, investigations, notes, minutes, or presentations for each internal review, whether formal or informal.

DOCUMENT REQUEST COS/USPS-3

Please provide all documents that relate to discounts accrued, accounted for, or provided to Bank of America under the terms of the Bank of America NSA, including underlying measurements and supporting documentation.

DOCUMENT REQUEST COS/USPS-4

Please provide all documents that relate to any part of Interrogatory COS/USPS-4 or the Postal Service's Response to any part of Interrogatory COS/USPS-4.

DOCUMENT REQUEST COS/USPS-5

Please provide all documents that relate to any part of Interrogatory COS/USPS-5 or the Postal Service's Response to any part of Interrogatory COS/USPS-5.

DOCUMENT REQUEST COS/USPS-6A

Please provide all documents that relate to any part of Interrogatory COS/USPS-6 or the Postal Service's Response to any part of Interrogatory COS/USPS-6.

DOCUMENT REQUEST COS/USPS-6B

Please provide all documents that relate to the potential effects of the Bank of America NSA on the broader marketplace or on competitors to Bank of America.

DOCUMENT REQUEST COS/USPS-7

Please provide all documents and communications that relate to Capital One's request for an NSA similar in any respect to the Bank of America NSA.

DOCUMENT REQUEST COS/USPS-8A

Please provide all documents that relate to any part of Interrogatory COS/USPS-8 or the Postal Service's Response to any part of Interrogatory COS/USPS-8, including all documents that relate to any other mailer's request for an NSA similar in any respect to the Bank of America NSA. The mailer's name may be redacted.

DOCUMENT REQUEST COS/USPS-8B

Please provide all documents that relate to the Postal Service's evaluation of any other mailer's qualifications (or lack of qualifications) for an NSA similar in any respect to the Bank of America NSA. The mailer's name may be redacted.

DOCUMENT REQUEST COS/USPS-9

Please provide all documents that relate to any part of Interrogatory COS/USPS-9 or the Postal Service's Response to any part of Interrogatory COS/USPS-9, including, but not limited to, any manuals or guidelines for evaluating potential NSA partners.

DOCUMENT REQUEST COS/USPS-10

Please provide all documents that relate to Interrogatory COS/USPS-10 or the Postal Service's Response to Interrogatory COS/USPS-10.

DOCUMENT REQUEST COS/USPS-11

Please provide all documents that relate to any part of Interrogatory COS/USPS-11 or the Postal Service's Response to any part of Interrogatory COS/USPS-11.

DOCUMENT REQUEST COS/USPS-12

Please produce all documents consulted, reviewed, or relied upon in answering any of the Interrogatories COS/USPS-1-11.

DOCUMENT REQUEST COS/USPS-13

For each Operational Commitment in Sections III and IV of the Bank of America NSA, please provide all documents that relate to (1) the time that Bank of America began or will begin to actually use each Operational Commitment; and (2) any concerns, obstacles, or modifications of how Bank of America's performance is to be measured under Section IV, including, but not limited to, performance measurements under Sections IV.C.3.a and IV.F.3.a of the Bank of America NSA.

DOCUMENT REQUEST COS/USPS-14

For the time period from January 1, 2005, to present, please provide all documents that relate in any way to the following aspects found in the Bank of America NSA: (1) read/accept rates, (2) early adoption of the Intelligent Mail Barcode (IMB); (3) computer services; (4) data collection, processing, or analysis services; (5) mailing and addressing services; (6) computer software or data rights. Please include communications and documents on these topics with all vendors, as well as with Bank of America and with any of Bank of America's potential or existing vendors or subcontractors.

DOCUMENT REQUEST COS/USPS-15

Please provide all documents, communications, and records of conversations between the Postal Service and Bank of America that relate to (1) the Postal Service's offering to another mailer an NSA that is functionally equivalent to the Bank of America NSA; (2) the Postal Service's offering any kind of NSA to Capital One (including communications and documents that relate to Capital One's Complaint case); and (3) the use of a niche tariff, experimental tariff, or rate structure other than an NSA to encourage improvements in mail processing and/or IMB implementation.

DOCUMENT REQUEST COS/USPS-16

Please provide all documents that relate to any step of the Postal Service approval process for the Bank of America NSA, including, but not limited to, reviews by the Executive Committee, the Finance Department, the Marketing Department, and any other Department, Committee, or Work Group.

DOCUMENT REQUEST COS/USPS-17

Please provide organizational charts for the period January 2005 to the present indicating names and titles of all persons who had responsibility for the preparation, analysis, negotiation, review, and approval of NSAs at the Postal Service.