

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

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**Complaint of Capital One  
Services, Inc.**

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**Docket No. C2008-3**

**DOCUMENT REQUEST OF THE  
AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO UNITED STATES POSTAL SERVICE (APWU/USPS-DR-1)  
(August 26, 2008)**

Pursuant to Sections 25 – 28 of the Rules of Practice of the Postal Regulatory Commission, and Order No. 92, the American Postal Workers Union, AFL-CIO (APWU) directs the following Document Request to United States Postal Service. Instructions and Definitions applicable to this Document Request are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service (APWU/USPS-1-5), filed concurrently on August 26, 2008, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson  
Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO

**APWU/USPS- DR-1.** Please file at the PRC in this Docket, to make available for copying by the parties, copies of any speeches, presentations or other documents used in the past year by any Postal officials, including Mr. Donahoe, Mr. Galligan, Mr. Day, Ms. Kingsley, Ms. Mehra and their staff members, that discuss the number of participants using and/or the volume of mail bearing the Intelligent mail barcode prior to the implementation of the Bank of America NSA. These should include presentations on the topic of the IMB as well as presentations on the proposed Service Standards tracking methods that would use the IMB as part of the design.