

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
OCT 3 11 27 AM '02
FEDERAL BUREAU OF INVESTIGATION
OFFICE OF THE ATTORNEY GENERAL

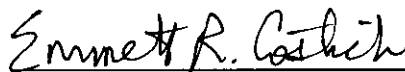
Experimental Changes to Implement)
Capital One NSA)

Docket No. MC2002-2

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS ANITA J. BIZZOTTO
(OCA/USPS-T1-1-3)
October 3, 2002

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-2 dated October 3, 2002, are hereby incorporated by reference.

Respectfully submitted,



SHELLEY S. DREIFUSS

Director

Office of the Consumer Advocate

EMMETT RAND COSTICH
Attorney

1333 H Street, N.W.
Washington, D.C. 20268-0001
(202) 789-6830; Fax (202) 789-6819

OCA/USPS-T1-1. Please refer to your testimony at page 5, lines 15-17, where you state "Capital One's volume is expected to grow over the term of the contract."

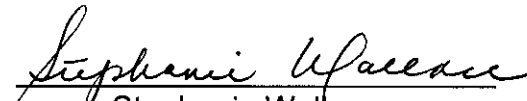
- (a) Please provide any forecasts that support the basis for your understanding that Capital One's volume is expected to grow during the three-year term of the Negotiated Service Agreement (NSA).
- (b) Is it your understanding that Capital One's volume is expected to grow during the next three years even in the absence of the proposed NSA? Please explain.

OCA/USPS-T1-2. Please refer to your testimony at page 6, lines 5-8. Please confirm that the declining block discount feature of the NSA results in a negative contribution to institutional costs of \$4.9 million (-\$6.7 million + \$1.8 million). If you do not confirm, please explain.

OCA/USPS-T1-3. Please refer to your testimony at page 5, lines 17-18. Please confirm that the electronic address change feature of the NSA results in cost savings of \$13.1 million. If you do not confirm, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.


Stephanie Wallace

Washington, D.C. 20268-0001
October 3, 2002