

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

RECEIVED  
Oct 4 2 46 PM '02  
POSTAL RATE COMMISSION  
OFFICE OF THE CONSUMER ADVOCATE

Experimental Changes to Implement )  
Capital One NSA )

Docket No. MC2002-2

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS JAMES D. WILSON  
(OCA/USPS-T4-1-5)  
October 4, 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-T4-1. Please refer to your testimony at page 3, lines 15-16.

- (a) Please confirm that pursuant to the Address Service Requested (ASR) for months 1 through 12, a First-Class mailer that inserts a keyline into the address block for the purpose of receiving electronic notification of move-related address changes has provided sufficient information (because of the keyline) to receive electronic notification for undeliverable-as-addressed (UAA) pieces that are not move-related. If you do not confirm, please explain.
- (b) Under Address Service Requested for months 1 through 12, is it possible for a First-Class mailer that inserts a keyline into the address block to receive only electronic notification of move-related address changes but not electronic notification for UAA pieces that are not move-related? Please explain.
- (c) With respect to Address Service Requested for months 1 through 12, does the Postal Service physically return to the mailer First-Class pieces that are UAA and can't be forwarded. Please explain.

OCA/USPS-T4-2. Please refer to your testimony at page 3, lines 15-16.

- (a) Please confirm that under the Negotiated Service Agreement (NSA), the Postal Service is providing Change Service Requested, Option 2, to Capital One at no charge. If you do not confirm, please explain.
- (b) Please confirm that in January 2003 the Postal Service will offer Change Service Requested, Option 2, to all First-Class mailers at no charge. If you do not confirm, please explain.

- (c) Please confirm that in the absence of the NSA, the Postal Service will offer Change Service Requested, Option 2, to Capital One at no charge. If you do not confirm, please explain.

OCA/USPS-T4-3. Please refer to your testimony at page 2, line 16.

- (a) Please confirm that on a per piece basis, the fee for electronic address correction is less than the cost to physically return First-Class Mail that is UAA to the mailer at no charge. If you do not confirm, please explain.
- (b) Please confirm that on a per piece basis, the cost for electronic address correction is less than the cost to physically return First-Class Mail that is UAA to the mailer at no charge. If you do not confirm, please explain.
- (c) Please provide the net cost savings per piece to provide electronic address correction to the mailer instead of physically returning First-Class Mail that is UAA at no charge.

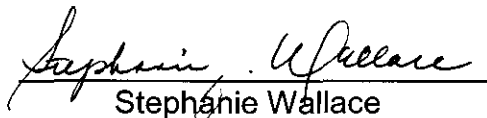
OCA/USPS-T4-4. Please refer to your testimony at page 2, lines 17-18. At the present time, Capital One has chosen to physically receive the returns of its First-Class Mail that is undeliverable-as-addressed (UAA) at no charge. Please explain manual correction (for which a \$0.70 fee is charged, pursuant to Fee Schedule 911) and how it differs from the physical return of First-Class Mail that is undeliverable-as-addressed (UAA) at no charge presently received by Capital One.

OCA/USPS-T4-5. Please refer to your testimony at page 3, lines 21-23.

- (a) For First-Class Mail, please provide the volume that bears the endorsement Address Service Requested (ASR) or Change Service Requested (CSR) in FY 2000 and 2001.
- (b) For First-Class Mail, please provide the volume that bears the endorsement ASR or CSR on which the electronic correction fee was charged in FY 2000 and 2001.
- (c) Please provide the number of First-Class mailers that were charged an electronic correction fee, and the volume and amount charged for each mailer in FY 2000 and 2001.

#### 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 4, 2002