

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

RECEIVED
Oct 11 2 50 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-T4-6-10)
October 11, 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-T4-6. Please refer to your testimony at page 1, lines 14-18.

- (a) For FY 2000, FY 2001 and FY 2002, please provide the total volume of First-Class Mail that was physically returned.
- (b) For FY 2000, FY 2001 and FY 2002, please provide the total volume of presorted First-Class Mail that was physically returned.
- (c) For FY 2000, FY 2001 and FY 2002, please provide the total volume of First-Class Mail that was forwarded.
- (d) For FY 2000, FY 2001 and FY 2002, please provide the total volume of presorted First-Class Mail that was forwarded.

OCA/USPS-T4-7. Please refer to your testimony at page 3, lines 3-4.

- (a) For FY 2000, FY 2001 and FY 2002, please provide the total number of electronic Address Change Service notifications for First-Class Mail endorsed "Address Service Requested."
- (b) For FY 2000, FY 2001 and FY 2002, please provide the total number of electronic Address Change Service notifications for First-Class Mail endorsed "Change Service Requested" by type of notice, i.e., new address, or reason for nondelivery.
- (c) For FY 2000, FY 2001 and FY 2002, please provide the total number of manual corrections (for which a \$0.70 fee is charged, pursuant to Fee Schedule 911) for First-Class Mail.

OCA/COS-T4-8. Please refer to your testimony at page 1, lines 14-18.

- (a) Please provide the percentage of Capital One's First-Class solicitation mail that was forwarded in FY 2000, FY 2001 and FY 2002.
- (b) Please provide the percentage of Capital One's First-Class customer account mail that was forwarded in FY 2000, FY 2001 and FY 2002.

OCA/USPS-T4-9. Please refer to your testimony at page 3, lines 7-10.

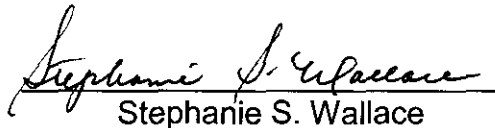
- (a) Please explain in detail the activities a First-Class mailer must undertake and complete to become enrolled in the Address Change Service (ACS) program.
- (b) Please explain in detail the activities the Postal Service's National Customer Support Center must undertake and complete to activate a First-Class mailer as a participant in the ACS program.
- (c) Please confirm that a First-Class mailer must pay a fee that covers the costs of the Postal Service associated with enrolling and activating such a mailer in the ACS program. If you do not confirm, please explain.
- (d) Please provide the cost to the Postal Service associated with enrolling and activating each First-Class mailer in the ACS program.
- (e) Please provide the form(s) to be completed by a First-Class mailer in order to be enrolled in the ACS program.

OCA/USPS-T4-10. Please refer to Section II of your testimony where you discuss the typical handling of First-Class Mail that is UAA, and alternative handling options.

- (a) For the participants in the ACS program, please discuss the reasons why, and types of, mailers that might utilize "Address Service Requested" versus "Change Service Requested."
- (b) Please discuss the reasons why, and types of, mailers that might utilize manual correction service (for which a \$0.70 fee is charged, pursuant to Fee Schedule 911) rather than participate in the ACS program.

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 S. Wallace

Washington, D.C. 20268-0001
October 11, 2002