

UNITED STATES OF AMERICA RECEIVED
Before The
POSTAL RATE COMMISSION Oct 11 2 49 PM '02
WASHINGTON, D.C. 20268-0001
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 CAPITAL ONE SERVICE, INC.,
WITNESS DONALD JEAN
(OCA/COS-T1-17-19)
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,


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Director
Office of the Consumer Advocate

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Attorney

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OCA/COS-T1-17. Please refer to your testimony at page 7, lines 1-4, where it states, "and utilize Address Correction Service information in its marketing campaigns."

- (a) Please confirm that under the NSA, Capital One will receive Change Service Requested, Option 2, at no charge for its First-Class solicitation mail. If you do not confirm, please explain.
- (b) Please confirm that under the NSA, Capital One will receive Change Service Requested, Option 2, at no charge for its First-Class customer account mail. If you do not confirm, please explain.

OCA/COS-T1-18. Please refer to your testimony at page 6, lines 1-9.

- (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.

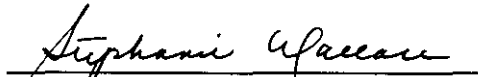
OCA/COS-T1-19. Please refer to your testimony at page 6, lines 21-22, and page 7, lines 1-4.

- (a) Assuming the NSA is implemented, please estimate the percentage of physical returns of Capital One's First-Class solicitation mail in FY 2004 and FY 2005, the second and third years of the agreement, respectively.
- (b) Assuming the NSA is implemented, please estimate the percentage of physical returns of Capital One's First-Class customer account mail in FY 2003, FY 2004 and FY 2005, the three-year period of the agreement.

- (c) Assuming the NSA is implemented, please estimate the percentage of Capital One's First-Class solicitation mail that will be forwarded in FY 2003, FY 2004 and FY 2005, the three-year period of the agreement.
- (d) Assuming the NSA is implemented, please estimate the percentage of Capital One's First-Class customer account mail that will be forwarded in FY 2003, FY 2004 and FY 2005, the three-year period of the agreement.

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 11, 2002