

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

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U.S. DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL

**EXPERIMENTAL RATE AND SERVICE
CHANGES TO IMPLEMENT NEGOTIATED
SERVICE AGREEMENT WITH
CAPITAL ONE SERVICES, INC.**

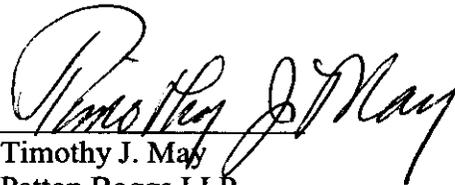
DOCKET No. MC2002-2

**RESPONSE OF CAPITAL ONE SERVICES, INC.
WITNESS STUART ELLIOTT TO INTERROGATORY OF
OFFICE OF CONSUMER ADVOCATE REDIRECTED FROM WITNESS JEAN
FILED ON OCTOBER 4, 2002
(OCA/COS-T1-7)**

Capital One Services, Inc hereby provides the response of witness Stuart Elliott to the following interrogatory of Office of Consumer Advocate redirected from witness Jean. OCA/COS-T1-7, filed on October 4, 2002.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted



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Counsel for Capital One Services, Inc.

Dated: October 15, 2002

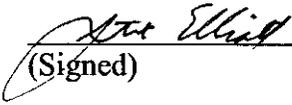
OCA/COS-T1-7. Please turn to your testimony at page 4, lines 21-24, where you indicate that the proposed agreement could cut the projected decrease in First-Class Mail volume by 15 to 53 million pieces. Please confirm that the 15 to 53 million pieces are solicitation mail pieces. If you do not confirm, please explain and disaggregate these volume figures into solicitation mail and non-solicitation mail.

OCA/COS-T1-7 Response.

Not confirmed. The cited section of Witness Jean's testimony refers to an after-rates volume projection described in my testimony. In that projection, the volume increase is divided between solicitation and customer mail. For Method 1, Exhibit 6 in my testimony shows the volume increases for solicitation and customer mail on lines 7 and 8, respectively. For Method 2, Exhibit 7 in my testimony shows the volume increases for solicitation and customer mail on lines 7 and 12, respectively.

DECLARATION

I, Stuart Elliott, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

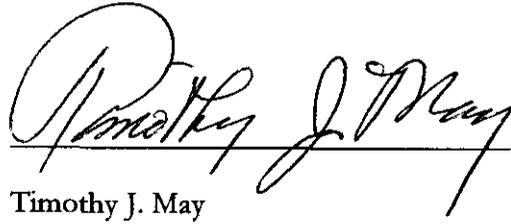


(Signed)

October 14, 2002

CERTIFICATE OF SERVICE

I hereby certify that I have this day served six copies of the foregoing document upon the United States Postal Service by hand and by First Class Mail upon all participants in this proceeding.



Timothy J. May

Dated: October 15, 2002