

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

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POSTAL RATE COMMISSION  
OFFICE OF THE PRESIDING OFFICER

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

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**DOCKET No. MC2002-2**

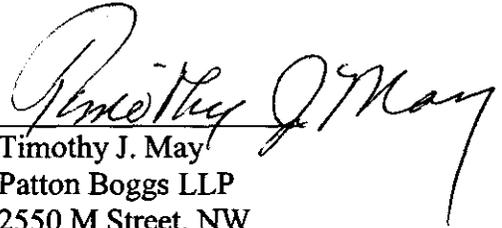
**MOTION OF CAPITAL ONE SERVICES, INC  
FOR PROTECTIVE ORDER**

Today, October 15, 2002, Capital One Service, Inc., (Capital One) is filing an Objection to the Office of Consumer Advocate interrogatory OCA/COS-T1-4(b) and (c). That interrogatory requests Capital One to discuss the relative importance of credit worthiness and pre-qualification to other factors in making mailing decisions. To answer would require the Company to disclose highly confidential and commercially sensitive strategies and techniques. Because the response may have some relevance to the Commission's understanding of the effect of the agreement upon other classes of mail, Capital One will provide this information if the Presiding Officer will issue an Order providing protective conditions, as provided for in § 3001.31a of the Rules of Practice and Procedure.

The Office of the Consumer Advocate has authorized me to represent that the OCA does not object to provision of the information requested in this interrogatory under protective order.

Therefore Capital One respectfully requests the Presiding Officer to enter an appropriate protective order.

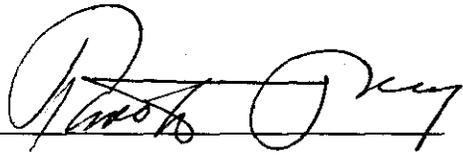
Respectfully submitted

  
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Counsel for Capital One Services, Inc

Dated: October 15, 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.

  
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Timothy J. May

Dated: October 15, 2002