

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

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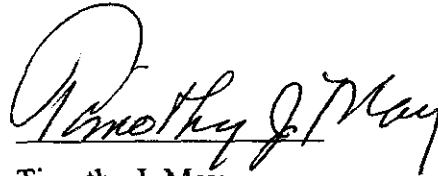
**EXPERIMENTAL RATE AND SERVICE
CHANGES TO IMPLEMENT NEGOTIATED
SERVICE AGREEMENT WITH
CAPITAL ONE SERVICES, INC.**

DOCKET No. MC2002-2

**CAPITAL ONE SERVICES, INC'S OBJECTION TO
OCA INTERROGATORIES TO WITNESS DONALD JEAN
(OCA/COS-T-1-2(c), 3(c), and 4(b) and (c))
FILED OCTOBER 4th, 2002**

1. OCA/COS-T1-2(c), asks for Capital One's unit costs of handling and processing returned pieces to make corrections to its address databases. OCA/COS-T1-3(c) calls for the estimated cost savings to Capital One for Change Service Requested, Option 2, at no charge, as compared to the physical return of Capital One's undeliverable as addressed First-Class Mail. Capital One does not have unit cost data and does not have readily available the data necessary to make the estimate requested. Even if it did, we object to the questions on the grounds of their relevance and materiality to the issues in this proceeding. How good or bad a deal the NSA is for Capital One is not an issue in this proceeding. It has no bearing on the cost savings to the Postal Service, and the benefit to other stakeholders. That Capital One negotiated a good or bad deal for itself is not an issue in this proceeding.
2. OCA/COS-T1-4(b) and (c) asks for the relative importance of creditworthiness and pre-qualification to other factors in making mailing decisions. While of some relevance, responding would require the Company to disclose highly confidential business strategies and techniques.

Respectfully submitted



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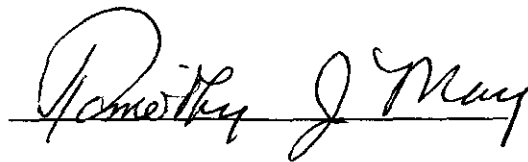
Fax: 202 457 6315

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.



Timothy J. May

Dated: October 15, 2002