

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

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Experimental Rate and Service Changes To
Implement Negotiated Service Agreement With
Capital One Services, Inc.


Docket No. MC2002-2

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
CAPITAL ONE SERVICES, INC. WITNESS STUART ELLIOTT
(NAA/UCOS-T-1-5)
October 17, 2002**

The Newspaper Association of America hereby submits the attached
interrogatories to Capital One Services, Inc. witness Stuart Elliott (COS-T-2) and
respectfully requests a timely and full response under oath.

Respectfully submitted,

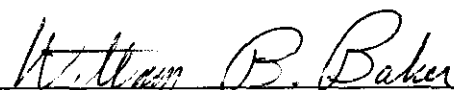
NEWSPAPER ASSOCIATION OF AMERICA

By: 
William B. Baker
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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all
participants requesting such service in this proceeding in accordance with section 12 of
the Rules of Practice.

October 17, 2002


William B. Baker

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
CAPITAL ONE SERVICES, INC. WITNESS STUART ELLIOTT
(NAA/UCOS-T-1-5)**

NAA/COS-T2-1: Please refer to Exhibit 2 of your testimony. Please provide the data for Standard Mail solicitations in September and October of 2002.

NAA/COS-T2-2: Please confirm that, in calculating the range of Capital One's volume responses to the NSA that you present in your testimony, the price elasticity of -0.388 for Standard Mail that you use is the Postal Service's estimated own-price elasticity of demand for Standard Regular mail. If you cannot confirm, please explain why not.

NAA/COS-T2-3: Have you prepared any estimate of Capital One's volumes of customer and solicitation mail for Fiscal Years 2004 and/or 2005? If so, please provide those estimated volumes. If not, please explain why not.

NAA/COS-T2-4: Please confirm that the estimated volumes of Capital One's First-Class mail that you calculate and present in your testimony are unaffected by the NSA's proposed rate discounts below the 1.45 billion piece level. If you cannot confirm, please explain why not.

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INTERROGATORIES TO
CAPITAL ONE SERVICES, INC. WITNESS STUART ELLIOTT
(NAA/UCOS-T-1-5)**

NAA/COS-T2-5: Please refer to page 2, lines 15 through 20, of your testimony, where you state that the average volume of Standard Mail solicitations for the past two years has been about 79 million pieces per month, and for First-Class mail about 63 million pieces per month from October 1999 to July 2002 (except for October 2001 through May 2002). Do you expect that Capital One's average monthly volume of Standard Mail solicitations will exceed its First-Class mail solicitations in:

- a. FY2003?
- b. FY2004?
- c. FY2005?