

UNITED STATES OF AMERICA  
Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Experimental Changes to Implement )  
Capital One NSA )

Docket No. MC2002-2

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS CHARLES L. CRUM  
(OCA/USPS-T3-11-14)  
October 25, 2002

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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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OCA/USPS-T3-11. Please refer to pages 2-4, "Increased Contribution from New Mail Volume," of your prefiled testimony. Please provide any analysis of Capital One's mail volume and/or of other mail volumes, which were relied upon by the USPS in its negotiation of the proposed Negotiated Service Agreement (NSA).

OCA/USPS-T3-12. Please refer to pages 1-2, "Background," of your prefiled testimony. Please provide any and all analyses of revenues, volumes, costs, or cost savings relied upon by the USPS in the negotiation of the proposed NSA which analyses address (a) the cost savings being made available by the proposed NSA to Capital One and/or to the USPS; (b) the migration of mail to First Class anticipated from the effects of the NSA; and, (c) the costs that the USPS anticipates will be occasioned to it in order to carry out and monitor performance of the proposed NSA.

OCA/USPS-T3-13. Please refer to pages 1-2, "Background," of your prefiled testimony.

- (a) Please provide your understanding, if any, of the amount of time devoted by postal management personnel to the negotiation and formation of the NSA. If your understanding rests on any documentation, please provide such documentation.
- (b) Please provide your understanding, if any, of the amount of time expected to be devoted by postal management personnel to the administration and enforcement of the NSA over the life of the agreement. If your understanding rests on any documentation, please provide such documentation.

OCA/USPS-T3-14. Please refer to pages 1-2, "Background," of your prefiled testimony. Please explain the relationship, if any, between the NSA's provisions for address correction savings and the NSA's provisions for volume-related discounts. In your response, describe and quantify the rate relationship if any between the NSA's proposed volume discounts and postal cost savings associated with address correction changes.