

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 JAMES D. WILSON  
(OCA/USPS-T4-11-12)  
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-T4-11. Please refer to your response to OCA/USPS-T4-2 (c), where you state that in the absence of the Negotiated Service Agreement (NSA), the Postal Service would not offer Change Service Requested, Option 2, to Capital One at no charge. Given that offering Change Service Requested, Option 2, to Capital One at no charge reduces Postal Service costs by \$13.1 million, please explain why offering electronic address change service at no charge in the absence of the agreement is not beneficial to the Postal Service. Please provide any relevant cost/benefit analysis that supports your response.

OCA/USPS-T4-12. Please refer to your response to OCA/USPS-T4-9(d). Please provide the figures, and the citations thereto, used in the formula that estimates the "\$15.00 [cost] per First-Class Mail enrollee in the ACS program."