

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
(OCA/USPS-6-8)
October 31, 2002

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-6. During its negotiations with Capital One concerning the Negotiated Service Agreement (NSA), did the Postal Service consider proposing, or did it propose, block rates that provided the largest discount for the first volume increment and subsequently smaller discounts for each succeeding volume increment? If so, why was such a block rate structure rejected?

OCA/USPS-7. During its negotiations with Capital One concerning the Negotiated Service Agreement (NSA), did the Postal Service consider proposing, or did it propose, block rates that provided the same discount for the first volume increment and each succeeding volume increment? If so, why was such a block rate structure rejected?

OCA/USPS-8. Please refer to Attachment G of the Request, the Negotiated Service Agreement at Article II, paragraph C, where it states “Capital One agrees to update its databases within 2 business days and use the information in all future marketing campaigns.”

- (a) Please confirm that the “2 business days” is determined from the day Capital One downloads electronic Address Change Service (ACS) information from the National Customer Support Center (NCSC). If you do not confirm, please explain.
- (b) Please confirm that Capital One has no affirmative obligation imposed upon it (by either the NSA or the proposed DMCS language) to download the electronic ACS information from the NCSC. If you do not confirm, please explain.

- (c) Please explain why there is no affirmative obligation on Capital One (in either the NSA or the proposed DMCS language) to require it to download the electronic ACS information from the NCSC.
- (d) Please explain why the databases to be updated within 2 business days by Capital One are not specified in the NSA.