

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 CAPITAL ONE SERVICE, INC.,
WITNESS DONALD JEAN
(OCA/COS-T1-20-23)
November 5, 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,

SHELLEY S. DREIFUSS
Director
Office of the Consumer Advocate

EMMETT RAND COSTICH
Attorney

1333 H Street, N.W.
Washington, D.C. 20268-0001
(202) 789-6830; Fax (202) 789-6819

OCA/COS-T1-20. Please refer to your response to OCA/COS-T1-2(b), where it states “Capital One is not provided with corrected address data on mail physically returned.”

- (a) Please confirm that the sole use to Capital One of undeliverable-as-addressed (UAA) First-Class solicitation mailpieces that are physically returned mail is for purposes of removing the names on such mailpieces from your solicitation mailing list(s). If you do not confirm, please describe other actions taken with respect to physically returned solicitation pieces.
- (b) For UAA First-Class solicitation mailpieces that are physically returned, please state whether such pieces have any value. If they do have value, what is the nature of the value to Capital One?

OCA/COS-T1-21. Please refer to your testimony at page 7, lines 3-4. Please confirm that Capital One has already developed the software code, or purchased vendor software, to automatically update its address databases within 2 business days of receiving electronic Address Change Service (ACS) information. If you do not confirm, please explain.

OCA/COS-T1-22. Please refer to your testimony at page 7, lines 3-4, wherein you discuss the cleansing of solicitation address files.

- (a) Please explain how Capital One intends to update its solicitation address files pursuant to the proposed NSA to utilize electronic ACS information.
- (b) Is Capital One’s process of cleansing its solicitation address files through the National Change of Address (NCOA) system (no more than 60 days prior to

mailing) different from the process it intends to implement to utilize electronic ACS information in its marketing campaigns? Please explain all such differences, if any.

- (c) Will the process of utilizing electronic ACS information in its marketing campaigns produce a different solicitation address file as compared to cleansing its solicitation address files through the National Change of Address system no more than 60 days prior to mailing? Please explain.

OCA/COS-T1-23. Please refer to your testimony at page 7, lines 3-4, wherein you discuss the cleansing of solicitation address files.

- (a) Does Capital One utilize one major solicitation address file, or does it use multiple solicitation address files, in its marketing campaigns? Please explain.
- (b) Please explain in detail how Capital One obtains solicitation address files; that is, does Capital One develop, purchase or rent such files; are such files used for a single mailing or multiple mailings; if multiple mailings, how many times?
- (c) Are solicitation address files utilized by Capital One continuously updated with new names? If so, from where do the new entries and updates originate? Please explain current practices, and explain such practices (if different) under the NSA.
- (d) How many days typically elapse between updates of a solicitation address file?
- (e) How many days typically elapse between the update of a solicitation address file and its use?

- (f) How many days typically elapse between solicitation mailings utilizing the same (but updated) solicitation address file(s)?
- (g) What is the advantage of updating a solicitation address file within 2 business days as opposed to updating the solicitation address file 60 days prior to mailing the solicitation?