

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

**EXPERIMENTAL RATE AND SERVICE
CHANGES TO IMPLEMENT NEGOTIATED
SERVICE AGREEMENT WITH
CAPITAL ONE SERVICES, INC.**

DOCKET No. MC2002-2

**CAPITAL ONE SERVICES, INC.'S OBJECTION
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORIES
TO WITNESS DONALD JEAN (APWU/COS-T1-4, 8, 11 and 16),
FILED NOVEMBER 1, 2002**

Capital One Services, Inc hereby objects to Interrogatories of the American Postal Workers Union, AFL-CIO (APWU/COS-T1-4, 8, 11 and 16), filed on November 1, 2002.

Each interrogatory is stated verbatim and is followed by an explanation of the objection.

Respectfully submitted

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Dated: November 12, 2002

APWU/COS-T1-4. On page 5 of your testimony, you provide a Before Rates projection of Capital One's mail volume for FY2003. In your testimony, you indicate that these projections were based on estimates made by "business managers." For which businesses of Capital One Services, Inc. were business managers questioned on this subject and what is the title of the business manager questioned at each such business? For which businesses of Capital One Financial Corporation were business managers questioned on this subject and what is the title of the business manager questioned at each such business? For which other businesses were business managers questioned on this subject and what are the titles of the business managers questioned at each such business? When were those projections solicited from business managers and when did they respond? Did all business managers questioned respond? What questions were asked of business managers to determine these volumes? Were all business managers questioned on each subject? Please identify, by business and title, each business manager from whom you requested information and received no response, an incomplete response or a response you could not use for your projections.

OBJECTION

APWU/COS-T1-4 asks the company to supply the names and titles of the business managers that Capital One solicited for estimates to make the FY2003 Before Rates projection of First Class Mail volume. To fully respond to the questions asked would require the company to divulge commercially sensitive business information concerning the methods of estimating mail volumes and the relevant commercial factors that are utilized in such projections. Moreover, the company objects to the request that the names and titles of the individuals in the company who provided estimates be supplied. The names of these individuals is certainly not relevant to this inquiry.

APWU/COS-T1-8. On page 3 of your testimony, you make the statement that Capital One has generally been moving its solicitation mailings from First Class mail to Standard mail. What is Capital One's expected volume of Standard solicitation mail for FY2003? What is Capital One's experience as to the difference in the response rates between First Class and Standard mail for similar solicitation offerings? What other factors determine if Capital One uses First Class or Standard mail to send its solicitations? Does the content of solicitations sent First Class vary from the content of those sent Standard, such as including more individualized information? If so, please detail how the content of solicitations sent First Class varies from the content of those sent Standard. What is Capital One's experience as to the difference in response rates between First Class and Standard mail based on the content of the mailings?

OBJECTION

APWU/COS-T1-8 asks the company a variety of questions which can generally be characterized as asking the company to compare its First Class Mail solicitations and its Standard Mail solicitations in a number of respects; and also asks for Standard Mail solicitation volume projections for FY2003. Capital One Standard Mail is not covered by the NSA; consequently, the numerous questions relating to Capital One's Standard Mail are simply a fishing expedition for information about the company's Standard Mail practices that have no relevance to the issues in this proceeding. As a convenience, we would point out that the company's response to OCA/COS-T1-13 does provide information with respect to the content of Solicitation Mail.

APWU/COS-T1-11. How long does it currently take from the time Capital One sends out a First Class mailing until returned mail pieces from that mailing are used to make changes to the mailing lists Capital One uses? Which mailing lists does Capital One correct based on this information? How long does it currently take from the time Capital One sends out a Standard mailing until returned mail pieces from that mailing are used to make changes to the mailing lists Capital One uses? Which mailing lists does Capital One correct based on this information? Has Capital One ever sent out a Standard mailing with any of the mailer endorsements in F010.5.3 of the Domestic Mail Manual? If so, what endorsements were used and when? If Capital One no longer uses certain endorsement for Standard mailings, why did Capital One cease using those endorsements?

PARTIAL OBJECTION

APWU/COS-T1-11 asks the company to supply information concerning address corrections, and mailer endorsements. With respect to its standard mailings, again, we object that such information with respect to Standard Mail has no bearing on the issues in this proceeding. This question also asks for information with respect to First Class Mailings and that information is being supplied.

APWU/COS-T1-16. What is the average weight of the customer account correspondence sent by Capital One? What is the average weight of First Class solicitation pieces sent by Capital One or its lettershops? What is the average weight of Standard solicitation pieces sent by Capital One or its lettershops? What depth of presort discount is currently used by Capital One (or its lettershops) for its customer account mailings? What depth of presort discount is currently used by Capital One for its First Class solicitation mailings? What depth of presort discount is currently used by Capital One for its Standard solicitation mailings?

OBJECTION

APWU/COS-T1-16 asks for the average weight of First Class Mail and Standard Mail solicitations; the depth of presort for customer account mailings, and for First Class and Standard Mail solicitations. We continue to object to questions related to Standard Mail on the grounds that they are not relevant to the issues in these proceedings. Moreover, even if Standard Mail issues were involved in this proceeding, the average weight and depth of presort of Standard mailings is not. Nor, is the average weight or the depth of presort of First Class customer or solicitation mailings of any relevance to the issues in this proceedings. No part of the NSA has anything to do with the weight of First Class mailings nor the depth of their presort. As a matter of information, we would note that Attachment A to the testimony of USPS Witness Crum, USPS-T3, does contain information about the depth of presort, and some information about the weight of Capital One First Class mailings for FY2001.