

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
INTERROGATORY TO CAPITAL ONE SERVICE, INC.,
WITNESS STUART ELLIOT
(OCA/COS-T2-6)
November 12, 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 an interrogatory and request 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-T2-6. Please refer to your response to Presiding Officer's Information Request (POIR) No. 1, Question 1, which requested mail volume data for Fiscal Years 1996 through 1999. Please provide the monthly volumes for Capital One's First-Class Marketing Mail, First-Class Customer Mail and Standard Class Marketing Mail during fiscal year 1999.

- (a) If monthly volumes are not available for all of fiscal year 1999, please list the months (by type of mail, as requested above) for which data are available. Provide any available monthly data.
- (b) The response to the POIR (at 3) indicated that it is difficult, time-consuming, and burdensome to reconstruct volume numbers prior to 1999. Please describe Capital One's record-keeping practices for the fiscal year period 1999-2002 and contrast those practices with the fiscal year period 1996-1998.
- (c) Does Capital One dispose of its mail volume and other business records on a regular basis or after a set period of time? If so, on what regular basis or set period of time? Is the basis or period of time determined, at least in part, by tax- or financial reporting requirements? Please explain.