

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 MICHAEL K. PLUNKETT  
(OCA/USPS-T2-26-35)  
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 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/USPS-T2-26. Please refer to your testimony at page 12, "C. Data Collection."

- (a) Please confirm that, during the course of the experiment, the Postal Service will collect data on Capital One's volume of undeliverable-as-addressed (UAA) First-Class solicitation mail that is forwarded. If you do not confirm, please explain.
- (b) Please confirm that, during the course of the experiment, the Postal Service will collect data on the number of electronic ACS notifications provided to Capital One for UAA First-Class solicitation mail that is forwarded. If you do not confirm, please explain.
- (c) Please confirm that, during the course of the experiment, the Postal Service will collect data on the number of electronic ACS notifications provided to Capital One for UAA First-Class solicitation mail that would otherwise be physically returned. If you do not confirm, please explain.
- (d) For each of the five types of data (marked by "bullets," at lines 11-18), identify which data will be obtained from (1) the permit system; (2) the address management system; and, (3) a special study.
  - (i) Explain the suitability of the permit and address management system to provide each of the five types of data.
  - (ii) Describe in detail every special study that will be conducted, including frequency of collection and whether data will be census or sample type. Also describe how Capital One will need to cooperate in order for the data to be collected.
- (e) Answer all questions posed in part (d) of this interrogatory with respect to the data listed in parts (a), (b), and (c) of this interrogatory.

OCA/USPS-T2-27. Please refer to your testimony at page 3, lines 7-9, and Article II, Paragraph C of the Agreement. Please define and explain what is meant by the phrase “update its address lists.”

OCA/USPS-T2-28. Please refer to your testimony at page 12, “C. Data Collection.” Please confirm that for each year of the agreement the Postal Service will collect for itself or from Capital One data on the number of

- (a) address lists and/or databases used by Capital One;
- (b) address lists and/or databases referred to in part (a) of this interrogatory that are updated pursuant to Article II, Paragraph C of the agreement;
- (c) corrections made to each address list and/or database referred to in part (b) of this interrogatory;
- (d) address lists and/or databases referred to in part (a) of this interrogatory that are updated pursuant to Article II, Paragraph C of the agreement and reused; and,
- (e) corrections made to each of the address lists and/or databases referred to in part (d) of this interrogatory.
- (f) For parts (a) through (e) of this interrogatory, describe in detail the method of data collection.

OCA/USPS-T2-29. Please refer to your testimony at page 12, “C. Data Collection.” Please confirm that the Postal Service will develop and report an annual estimate of the physical returns eliminated and forwards avoided as a result of updates to Capital One’s

address lists and/or databases. If you do not confirm, please explain. Describe in detail the method of data collection.

OCA/USPS-T2-30. Please refer to the Agreement between the Postal Service and Capital One, Attachment G to the Request. Under the section, **Address and Other Quality Issues**, Article II, Paragraph C, “Capital One agrees to update its databases within 2 business days and use the information in all future marketing campaigns.”

- (a) Within 2 business days of what? Please confirm that since the agreement does not specify what triggers the requirement to update the database, under the agreement, Capital One is not subject to a 2-day update requirement.
- (b) How will Capital One “use the information in all future marketing campaigns?” Does this mean that every Capital One mailing, whether or not from an affected database (or mailing list), must be screened to see if it contains an address identified as UAA from an earlier electronic notification? Please explain.

OCA/USPS-T2-31. Please refer to the Agreement between the Postal Service and Capital One, Attachment G to the Request. Under the section, **Address and Other Quality Issues**, Article II, Paragraph A, the last sentence addresses the disposal of Capital One’s First-Class Mail solicitations.

- (a) What are the applicable Federal laws appertaining to the disposal of the Capital One First-Class Mail solicitations? Please give citations for all applicable Federal laws.

(b) What are the Postal Service's "operating instructions?" Please present the full text of these instructions and citations for them.

OCA/USPS-T2-32. Please refer to the Agreement between the Postal Service and Capital One, Attachment G to the Request, and the **Address and Other Quality Issues**, Article II, Paragraph G. What are the "published Postal Service Move Update requirements for automation compatible mail?" Please present the full text of these requirements and citations for them.

OCA/USPS-T2-33. Please refer to the Negotiated Service Agreements Classification Schedule, Capital One Negotiated Service Agreement, section 610.2:

The fees for address correction in Fee Schedule 911 are waived for those First-Class Mail solicitations on which Capital One uses the endorsement specified by the Postal Service, if:

. . .

[Capital One] updates its databases within 2 days after receipt of address correction information and uses the information in all future First-Class Mail marketing campaigns.

- (a) Please confirm that the DMCS does not impose a requirement on Capital One to receive address correction information.
- (b) Please confirm that the DMCS does not impose a requirement on Capital One to endorse its First-Class Mail solicitation pieces.
- (c) Please confirm the following: given that there is neither a requirement for Capital One to endorse its First-Class Mail solicitation pieces nor to receive address correction information, Capital One may opt to omit the (CSR) endorsement from

its First-Class Mail solicitation pieces, thereby receiving no address correction notices, and avoiding any address correction fees.

OCA/USPS-T2-34. Please explain why the following specifications of the Agreement were omitted from the classification schedule requirements:

- (a) Agreement, Attachment G, Key Condition I.B. “Capital One agrees to receive electronic information about its undeliverable-as-addressed solicitations sent as First-Class Mail, instead of physical return of the pieces.”
- (b) Address and Other Quality Issues, II.A. “Capital One will apply the endorsement ‘Change Service Requested’ (CSR) to all First-Class Mail solicitations . . . .”

OCA/USPS-T2-35. Why are the Classification Schedule and Agreement silent on key details of transmission and receipt of address correction information, thereby raising doubts whether Capital One will ever “receive” electronic address corrections and update its databases?