

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

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

**DOCKET No. MC2002-2**

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**CAPITAL ONE SERVICES, INC.'S OBJECTION  
TO OFFICER OF THE COMMISSION INTERROGATORY  
TO WITNESS DONALD JEAN (OCA/COS-T1-23(a), (b), (d), (e), and (f)),  
FILED NOVEMBER 5, 2002**

Capital One Services, Inc hereby objects to the Interrogatory of the Office of Consumer Advocate (OCA): OCA/COS-T1-23(a), (b), (d), (e), and (f), filed on November 5, 2002.

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

Respectfully submitted

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Dated: November 13, 2002

**OCA/COS-T1-23(a), (b), (d), (e), and (f).** 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?
- (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)?

## **OBJECTION**

OCA/COS-T1-23(a), (b), (d), (e), and (f), ask for detailed information about the manner in which Capital One obtains, manipulates, and uses its solicitation address files for its marketing campaigns. The relevance of these questions is not immediately apparent; we fail to understand how this information could lead to the discovery of admissible evidence relevant to the issues in this proceeding. Even if relevance can be demonstrated, the questions ask for highly sensitive and privileged commercial information, the release of which would cause competitive harm to the company.