

**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

**AMERICAN POSTAL WORKERS UNION, AFL-CIO
INTERROGATORIES TO CAPITAL ONE SERVICES, INC.
WITNESS DONALD JEAN
(APWU/COS-T1-19-21)
(November 14, 2002)**

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the American Postal Workers Union, AFL-CIO ("APWU") hereby submits interrogatories and requests for production of documents to Witness Donald Jean.

Respectfully submitted,

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CERTIFICATION

I hereby certify that I have this date served the following document in accordance with the rules of practice.

Susan L. Catler
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Washington, DC 20005-4126

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APWU/COS-T1-19.

In your response to APWU/COS-T1-2 you list the affiliates of Capital One Services, Inc. and state they could change over time. You also state the company's understanding is that the proposed Negotiated Service Agreement is limited to mailings by company affiliates.

- (a) Please provide a definition of "affiliate" of Capital One Services, Inc. as you understand that term to be used in your testimony and the proposed Negotiated Service Agreement.
- (b) Please identify and quantify the ownership arrangement that identifies an affiliate of Capital One Services, Inc.
- (c) For an entity to be an affiliate of Capital One Services, Inc., must it be 100% owned by Capital One Financial Corporation? If not, what percentage of ownership by Capital One Services, Inc. or Capital One Financial Corporation is required for an entity to be an affiliate of Capital One Services, Inc.?
- (d) Are there any other identifying characteristics of an affiliate? If so what are they?

APWU/COS-T1-20.

In your response to APWU/COS-T1-3 you identify mail relating to accounts serviced by Capital One Services, Inc. as being covered under the proposed Negotiated Service Agreement.

- (a) What does Capital One Services, Inc. do for accounts it services?
- (b) Does Capital One Services, Inc. service accounts for entities other than affiliates?
- (c) If Capital One provides servicing of accounts for non-affiliates, is it your understanding that the mail of those non-affiliates would be covered or counted in any way by the proposed Negotiated Service Agreement? If your answer is yes, please explain exactly how the mail of those non-affiliates would be covered or counted by the proposed Negotiated Service Agreement.
- (d) If Capital One Services, Inc. provides servicing of accounts for non-affiliates, what services does Capital One Services, Inc. provide to non-affiliates?
- (e) If Capital One provides servicing of accounts for non-affiliates, what mailing services does Capital One provide to non-affiliates?
- (f) If Capital One provides servicing of accounts for non-affiliates, does Capital One provide only mailing services to some non-affiliates?
- (g) If Capital One provides servicing of accounts for non-affiliates, does servicing always include more than the provision of mailing services?
 - (1) If it does, what other aspects of a relationship between Capital One and a non-affiliate would constitute a "servicing" arrangement?
 - (2) If it does, what other services does Capital One provide to non-affiliates?
- (h) If Capital One provides servicing of accounts for non-affiliates, what type of companies are those non-affiliates?

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APWU/COS-T1-21.

Section 1.F. of the proposed agreement states that "Capital One's mail relates to its products and services, including but not limited to sales and other promotions run in conjunction with Capital One's strategic partners or as part of strategic alliances with other entities."

- (a) Please provide a definition of "strategic partner" as you understand that term to be used in your testimony and the proposed Negotiated Service Agreement.
- (b) Please identify and quantify the ownership arrangement that identifies a strategic partner of Capital One Services, Inc.
- (c) For an entity to be a strategic partner of Capital One Services, Inc., must it be 100% owned by Capital One Financial? If not, what percentage of ownership by Capital One Financial is required?
- (d) Are there any other identifying characteristics of a strategic partner? If so what are they?
- (e) In what ways does a strategic partner differ from an affiliate?
- (f) Please define a "strategic alliance with other entities" as you understand that term in the context of your testimony and the proposed Negotiated Service Agreement.
- (g) In what ways does a strategic alliance with other entities differ from an affiliate?
- (h) In what ways does a strategic alliance with other entities differ from a strategic partner?