

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

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS JAMES D. WILSON
(NAA/USPS-T4-11-13)
November 15, 2002**

The Newspaper Association of America hereby submits the attached
interrogatories to United States Postal Service witness James D. Wilson (USPS-T-4)
and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document in accordance
with section 12 of the Rules of Practice and the Presiding Officer's rulings.

November 15, 2002

William B. Baker

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS JAMES D. WILSON
(NAA/USPS-T4-11-13)**

NAA/USPS-T4-11: To what extent do Capital One's mailpieces that are returned physically through the CFS units, or through some other means, have a Capital One return barcode on them? Does the CFS unit place such a return barcode on some or all of the returned pieces?

NAA/USPS-T4-12: Please state the proportion of Capital One's returned pieces that go through a CFS unit as opposed to being handled manually, such as by a nixie clerk, and compare this proportion with the average proportions for all returned First-Class Mail.

NAA/USPS-T4-13: Please describe the processing of Capital One's returned pieces and compare this processing to that received by average returned First-Class mailpieces, focusing specifically on:

- (a) the proportion of Capital One's pieces that destinate (and are then picked up by or delivered to Capital One) at an Area Distribution Center;
- (b) the proportion of Capital One pieces that receive more than one outgoing sort, given that they may be going to a major Area Distribution Center; and
- (c) the proportion of Capital One pieces that receive only one incoming sort due to going to a dedicated sorting bin for a high-volume customer.