

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  
CAPITAL ONE SERVICES, INC. WITNESS DONALD JEAN  
(NAA/COS-T1-13-24)  
November 15, 2002**

The Newspaper Association of America hereby submits the attached  
interrogatories to Capital One Services witness Donald Jean (COS-T-1) 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 on all  
participants requesting such service in this proceeding in accordance with section 12 of  
the Rules of Practice.

November 15, 2002

\_\_\_\_\_  
William B. Baker

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(NAA/COS-T1-13-24)**

NAA/COS-T1-13: Please refer to your response to APWU/COS-T1-17. At what Capital One production site or sites is solicitation mail produced? Are those sites MPTQM certified, or do you expect them to be during the effective period of the NSA?

NAA/COS-T1-14: Please refer to Section II.G of the NSA, which provides that Capital One “agrees that it cannot use the CSR endorsement as a means to comply with the published Postal Service Move Update requirements for automation compatible mail. Capital One will continue to comply with Move Update through either NCOA match or FastForward.” What does Capital One view as the purpose of this provision?

NAA/COS-T1-15: Please refer to your response to OCA/COS-T1-20. Today, after Capital One has received a returned piece of First-Class solicitation mail and has updated the company database accordingly, does that prevent Capital One from sending another solicitation to the same address?

NAA/COS-T1-16: Please again refer to the response to OCA/COS-T1-20. Today, when Capital One has received a returned piece of First-Class solicitation mail and updated the company database accordingly, does that prevent Capital One from sending another solicitation to the same address if it uses a list provided by an outside vendor? Please explain.

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NAA/COS-T1-17: Please again refer to the response to OCA/COS-T1-20.

Today, when Capital One has received a returned piece of First-Class solicitation mail and updated the company database accordingly, does that prevent Capital One from sending another solicitation to the same address if the mailing is prepared by an outside lettershop? Please explain.

NAA/COS-T1-18: When Capital One obtains (via purchase, rental, or exchange) mailing lists from third-party vendors that it uses for its First-Class Mail solicitations:

- a. under what circumstances does it compare those lists with any internal lists that have already received address correction to clean the address; and
- b. please describe any changes to these operations that will occur if the NSA is approved and implemented.

NAA/USPS-T1-19: When obtaining (via purchase, rental, or exchange) mailing lists from third-party vendors that Capital One intends to use for First-Class Mail solicitations, what sort of representations or guarantees does Capital One require concerning the currency and accuracy of such lists?

NAA/COS-T1-20: If the NSA is approved and implemented as proposed in this proceeding, please explain what steps Capital One will take to ensure that the electronic address correction information in fact is used to avoid sending a further solicitation to the same address.

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NAA/COS-T1-21: Mail can be returned to sender marked undeliverable for a number of reasons (see DMM F010.4, Exhibit 4.1). During 2001, did Capital One ever sample any of its First-Class undeliverable solicitation mail that is returned to Capital One (including third-party vendors or letter shops employed by Capitol One) to ascertain the principle reason(s) why it was undeliverable? If so, please summarize the results. If such results cannot be summarized, please give your best impression as to the major reasons for Capital One's First-Class solicitation mail being returned instead of being forwarded.

NAA/COS-T1-22: Assuming that the NSA were approved and implemented as submitted:

- a. After mailing lists obtained (via purchase, rental, or exchange) from outside vendors are used for First-Class Mail solicitation, and Capital One subsequently obtains electronic information via ACS on pieces that were UAA, what feedback, if any, does Capital One plan to give to its list providers following implementation of the agreement with the Postal Service?
- b. Does Capital One plan to use electronic ACS returns to correct lists obtained (via purchase, rental, or exchange) from third-party providers?
- c. If the response to part b is affirmative, will Capital One return the corrected lists to the appropriate third-party providers? If not, does Capital One at least plan to inform its list vendors as to how "clean" or "dirty" their lists are?
- d. If the response to part b is negative, please explain how the failure to correct lists accords with the agreement, as described in USPS-T-2, page 3, lines 8-9, "to update [Capital One's] lists with new address information within two days of receipt."

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NAA/COS-T1-23: Please refer to your response to APWU/COS-T1-13, which states that “the company is not responsible for third party mailing lists.” Please explain what you mean by “not responsible.” Does this mean that the company disclaims all responsibility for:

- a. Checking third-party lists against DMA’s “Do Not Mail” list prior to use?
- b. Electronically cleaning third-party lists prior to using them for a First-Class solicitation mailing?
- c. Using First-Class Mail that has been physically returned to clean third-party lists prior to re-using them?

NAA/COS-T1-24: Please refer to Exhibit 2 to the testimony of witness Elliott, as revised. Would the sum of Capital One’s First-Class Mail solicitations from October 2000 through September 2001 serve as a reasonable proxy for Capital One’s First-Class Mail solicitation volume for postal fiscal year 2001? If not, please explain what further adjustments would be appropriate or provide, if available, the actual volume of First-Class Mail solicitations.