

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 CAPITAL ONE SERVICE, INC.,
WITNESS DONALD JEAN
(OCA/COS-T1-24-29)
November 15, 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,

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OCA/COS-T1-24. Please refer to your response to OCA/COS-T1-2. Please explain how First-Class solicitation mailpieces that are physically returned are handled and processed by Capital One.

OCA/COS-T1-25. Please refer to your responses to OCA/COS-T1-20(a).

- (a) Please confirm that with respect to First-Class solicitation mailpieces that are physically returned, the term “updating” includes the activity “address suppression,” as described in your response to OCA/COS-T1-12(d). If you do not confirm, please explain.
- (b) Please confirm that with respect to First-Class solicitation mailpieces that are physically returned, the term “updating” includes correcting addresses in solicitation databases. If you do not confirm, please explain.
- (c) With respect to First-Class solicitation mailpieces that are physically returned, please describe and explain any other activities or uses encompassed by the term “updating,” as used in your response.

OCA/COS-T1-26. Please refer to the response of USPS witness Plunkett to

APWU/USPS-T1-1, redirected from witness Bizzotto, which states, in part:

My understanding is that Capital One places the updated information into a database that it maintains for its returns. Any address that Capital One uses for its First-Class Mail solicitations is then run against the return database.

- (a) Please confirm that witness Plunkett’s understanding is correct. If you do not confirm, please explain.

- (b) What specific changes are made to address lists that are “run against the return database”?

OCA/COS-T1-27. Please refer to your response to OCA/COS-T1-18(a) and (b), where you state, by reference to OCA/COS-T1-9(c), that “Capital One has no way to estimate” the percentage of Capital One’s First-Class solicitation and customer account mail that is forwarded. Also, please refer to the response of Postal Service witness Crum to APWU/USPS-T3-4(d), which states “I am assuming that Capital One’s First-Class Mail is forwarded at or below the average rate.” Do you have any information that would support witness Crum’s assumption? Please explain.

OCA/COS-T1-28. Please refer to your response to OCA/COS-T1-21.

- (a) What was the date of acquisition of the software to automatically update address databases?
- (b) What does this software do to “automatically update” address databases?
- (c) Please refer to your testimony at page 6, lines 12-13. With respect to physical returns, is Capital One currently using this software to improve its address database?
- (d) Under the terms of the NSA, will the software acquired by Capital One produce anything different from what it produces now in terms of improving its address database? Please describe such differences, if any.

OCA/COS-T1-29. Please refer to your testimony at page 6, lines 6-7. Please show all calculations, and cite all sources, used to derive the figures 9.8 percent and 9.6 percent.