

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

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PLUNKETT
TO INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO,
REDIRECTED FROM WITNESS BIZZOTTO
(APWU/USPS-T1-3)

The United States Postal Service hereby provides the a revision to the response of witness Plunkett to interrogatory APWU/USPS-T1-3, redirected from witness Bizzotto, which was originally filed on November 12, 2002. The revision is to add the missing reference in the answer to part (d).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 18, 2002

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PLUNKETT
TO INTERROGATORY OF AMERICAN POSTAL WORKERS UNION, AFL-CIO,
REDIRECTED FROM WITNESS BIZZOTTO

APWU/USPS-T1-3. Under the proposed Negotiated Service Agreement between Capital One and the USPS,

- (a) What is your understanding of key condition I., F. "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 a part of strategic alliances with other entities."
- (b) How will this condition be monitored in order to prevent a violation of condition III, K " Capital One may not use the threshold permit to mail on behalf of any other company or entity."
- (c) Please identify Capital One's strategic partners and all strategic alliances Capital One has with other entities that could result in mailings covered by the Agreement.
- (d) Please identify Capital One's products and services that could result in mailings covered by the Agreement.

RESPONSE:

- a. This section defines the type of mail that Capital One currently mails.
- b. Please refer to section IV (A-B) of the agreement.
- c. I am unaware of Capital One's current strategic partners or alliances.
- d. Please refer to the testimony of witness Jean (COS-T-1, at 2-4) for a description of how Capital One will make use of the Agreement.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Scott L. Reiter

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