

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001**

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**EXPERIMENTAL RATE AND SERVICE  
CHANGES TO IMPLEMENT NEGOTIATED  
SERVICE AGREEMENT WITH  
CAPITAL ONE SERVICES, INC.**

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**DOCKET No. MC2002-2**

**MOTION OF CAPITAL ONE SERVICES, INC  
FOR PROTECTIVE ORDER**

Today, November 25, 2002, Capital One Services, Inc., (Capital One) is filing an Objection to the Office of Consumer Advocate interrogatory OCA/COS-T1-29. That interrogatory asks Capital One to provide all the calculations used, citing all sources, to derive witness Jean's estimate that, for 2001, the Company had approximately 9.8 percent of its First-Class mail solicitations returned, and for 2002, approximately 9.6 percent. As our objection notes, the revelation of the calculations, and their sources, would divulge commercial information of a highly sensitive nature which could damage the Company competitively. Because we understand that it is important to be able to verify, or to authenticate, estimates made as to past returns of First-Class solicitation mail, Capital One will provide this information if the Presiding Officer will issue an Order providing protective conditions, as provided for in § 3001.31a of the Rules of Practice and Procedure.

Therefore Capital One respectfully requests the Presiding Officer to enter an appropriate Protective Order.

Respectfully submitted

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