

**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**

**RESPONSE OF CAPITAL ONE SERVICES, INC.  
WITNESS STUART ELLIOTT TO INTERROGATORY OF  
OFFICE OF CONSUMER ADVOCATE  
FILED ON NOVEMBER 12, 2002  
(OCA/COS-T2-6)**

Capital One Services, Inc hereby provides the response of witness Stuart Elliott to the following interrogatory of Office of Consumer Advocate: OCA/COS-T2-6, filed on November 12, 2002.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted

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Timothy J. May  
Patton Boggs LLP  
2550 M Street, NW  
Washington, D.C. 20037-1350  
Tel: 202 457 6050  
Fax: 202 457 6315  
Counsel for Capital One Services, Inc.

Dated: November 25, 2002

**OCA/COS-T2-6.**

Please refer to your response to Presiding Officer's Information Request (POIR) No. 1, Question 1, which requested mail volume data for Fiscal Years 1996 through 1999.

Please provide the monthly volumes for Capital One's First-Class Marketing Mail, First-Class Customer Mail and Standard Class Marketing Mail during fiscal year 1999.

- (a) If monthly volumes are not available for all of fiscal year 1999, please list the months (by type of mail, as requested above) for which data are available. Provide any available monthly data.
- (b) The response to the POIR (at 3) indicated that it is difficult, time-consuming, and burdensome to reconstruct volume numbers prior to 1999. Please describe Capital One's record-keeping practices for the fiscal year period 1999-2002 and contrast those practices with the fiscal year period 1996-1998.
- (c) Does Capital One dispose of its mail volume and other business records on a regular basis or after a set period of time? If so, on what regular basis or set period of time? Is the basis or period of time determined, at least in part, by tax- or financial reporting requirements? Please explain.

**ANSWER**

- (a) Available monthly data are provided below in Table 1.
- (b) It is my understanding that Capital One's active databases do not contain the requested volume figures prior to 1999. Even if such data could be reconstructed from other sources, that data would not necessarily have volume

data in a form that could readily be summarized by the requested mail categories.

- (c) Capital One does not dispose of its mail volume records pursuant to a record retention policy.

**Table 1: Capital One Volume of Customer Mail and Solicitations:  
October 1998 to September 1999**

Month	Customer Mail	First-Class Mail Solicitations	Standard Mail Solicitations
Oct-98	20,000,000*	64,312,211	2,279,673
Nov-98	20,000,000*	84,513,668	1,248,749
Dec-98	20,000,000*	70,330,103	698,236
Jan-99	20,093,585	48,713,996	4,704,266
Feb-99	18,936,302	51,911,135	6,815,494
Mar-99	21,429,647	101,113,831	5,442,520
Apr-99	20,237,967	53,185,873	21,569,499
May-99	21,493,755	42,784,936	21,335,863
Jun-99	21,315,898	51,911,418	15,785,065
Jul-99	22,366,963	82,763,889	27,986,822
Aug-99	22,218,406	45,709,167	66,617,101
Sep-99	22,283,276	47,420,011	42,448,557

\* Estimate