

**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**

**CAPITAL ONE SERVICES, INC.'S OBJECTION  
TO THE OFFICE OF THE CONSUMER ADVOCATE INTERROGATORIES  
TO WITNESS DONALD JEAN (OCA/COS-T1-26(b) and 29),**

Capital One Services, Inc. hereby objects to Interrogatories of the Office of Consumer Advocate (OCA): OCA/COS-T1-26(b) and 29, filed on November 15, 2002.

The interrogatories are stated verbatim and are followed by an explanation of the objection.

Respectfully submitted

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Dated: November 25, 2002

**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.

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

**OBJECTION:** OCA/COS-T1-26(b) asks what specific changes Capital One makes to address lists that are “run against the return database.” The Company regards this information as proprietary and highly sensitive.

**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.

**OBJECTION:** OCA/COS-T1-29 asks for 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. The revelation of the calculations, and their sources, would divulge commercial information of a highly sensitive nature which could damage the company competitively. A Motion to provide this information under seal is being filed with the Presiding Officer.