

**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

**CAPITAL ONE SERVICES, INC.'S OBJECTION
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORY
TO WITNESS DONALD JEAN (NAA/COS-T1-19)**

Capital One Services, Inc. hereby objects to the Interrogatory of the Newspaper Association of America (NAA): NAA/COS-T1-19, filed on November 15, 2002.

The interrogatory is stated verbatim and is followed by an explanation of the objection.

Respectfully submitted

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Dated: November 25, 2002

**OBJECTION OF CAPITAL ONE SERVICES, INC.
WITNESS DONALD JEAN TO INTERROGATORIES OF NAA**

NAA/USPS-T1-19 (sic): When obtaining (via purchase, rental, or exchange) mailing lists from third-party vendors that Capital One intends to use for First-Class Mail solicitations, what sort of representations or guarantees does Capital One require concerning the currency and accuracy of such lists?

OBJECTION: NAA/USPS/T1-19 (sic) (obviously this was intended to read NAA/COS/T1-19) asks what representations or guarantees Capital One requires from third party vendors as to the currency and accuracy of such lists. This requests information that is both irrelevant to this proceeding and, to the extent that there are such representations or guarantees, asks for proprietary information.