

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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PLUNKETT
TO INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T2-36)

The United States Postal Service hereby provides the response of witness
Plunkett to the following interrogatory of Office of the Consumer Advocate: OCA/USPS-
T2-36, filed on November 15, 2002.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Scott L. Reiter

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November 25, 2002

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PLUNKETT
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T2-36. Please refer to your response 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.

- (a) What specific changes are made to address lists that are “run against the return database”?
- (b) Please provide documentation to support the statement quoted above.
- (c) If documentation is not available, please describe the basis for your understanding.
- (d) If documentation is not available, what information was provided to you, and who was the source of such information, upon which you based your understanding?

RESPONSE:

- a-c. My understanding is that, in the event a piece of mail is returned as undeliverable, that information is used to identify the address as having generated a piece of UAA mail, and that that information is then retained for as long as the list is in active use.
- d. This information was provided verbally by Capital One during the course of negotiations and case preparation.

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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