

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 WILSON TO
INTERROGATORIES OF NEWSPAPER ASSOCIATION OF AMERICA
(NAA/USPS-T4-11-12)

The United States Postal Service hereby provides the responses of witness
Wilson to the following interrogatories of Newspaper Association of America:
NAA/USPS-T4-11-12, filed on November 15, 2002. Interrogatory 13 is redirected to the
Postal Service.

Each 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

Nan K. McKenzie

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November 26, 2002

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NAA/USPS-T4-11: To what extent do Capital One's mailpieces that are returned physically through the CFS units, or through some other means, have a Capital One return barcode on them? Does the CFS unit place such a return barcode on some or all of the returned pieces?

Response:

I believe that a majority of Capital One return-to-sender mail will have a barcode placed on it by the mail processing facility. It is my understanding that CFS does not place a barcode but delivers it to processing plant where the barcode is applied to the piece.

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NAA/USPS-T4-12: Please state the proportion of Capital One's returned pieces that go through a CFS unit as opposed to being handled manually, such as by a nixie clerk, and compare this proportion with the average proportions for all returned First-Class Mail.

Response:

The only Capital One mail that the CFS units would currently return is move-related mail processed in months 13-18 after the customer's move-effective date. For First-Class Mail non-ACS participants, this is the only type of mail that the CFS unit returns. I do not know the proportion of Capital One's mail that is UAA for a move-related reason and occurs in the 13 – 18 month time period. I understand that approximately 4 percent of all move-related UAA First-Class Mail occurs in the time period of 13 – 18 months. Based upon my understanding of its address hygiene practices, I would expect the percent of Capital One's volume of move-related UAA First-Class Mail that is returned to sender because it occurs in the time period 13 – 18 months, to be less than or equal to the average.

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.

Nan K. McKenzie

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