

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Experimental Changes to Implement)
Capital One NSA)

Docket No. MC2002-2

OFFICE OF THE CONSUMER ADVOCATE
FOLLOW-UP INTERROGATORIES TO CAPITAL ONE SERVICE, INC.,
WITNESS DONALD JEAN
(OCA/COS-T1-30-32)
November 26, 2002

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits follow-up interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-2 dated October 3, 2002, are hereby incorporated by reference.

Respectfully submitted,

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OCA/COS-T1-30. Please refer to your responses to OCA/COS-T1-25(a) and NAA/COS-T1-15, which state

Information that a mailpiece has been returned for a particular address is added to the company's records. This information is then used as part of the mailing decision process for future campaigns.

- (a) Under Capital One's current practices, where a First-Class solicitation "mailpiece has been returned for a particular address," does the "mailing decision process" include the option that the address on such a returned mailpiece may be used in subsequent First-Class solicitation mail marketing campaigns? Please explain.
- (b) Under the Negotiated Service Agreement (NSA), where Capital One will receive an electronic notification that a First-Class solicitation mailpiece has been "returned" for a particular address, will the "mailing decision process" include the option that the address for such a "returned" mailpiece may be used in subsequent First-Class solicitation mail marketing campaigns? Please explain.
- (c) Considering Capital One's current practices with respect to "[i]nformation that a mailpiece has been returned for a particular address," under what circumstances (if any) may the address on such a returned mailpiece be used in subsequent First-Class solicitation mail marketing campaigns? Please explain.
- (d) Considering Capital One's practices under the NSA with respect to an electronic notification that a mailpiece has been "returned" for a particular address, under what circumstances (if any) may the address for such a "returned" mailpiece be used in subsequent First-Class solicitation mail marketing campaigns? Please explain.

(e) Does the “mailing decision process” refer to an existing computer program?
Please explain.

(i) If so, list the decision rules of the computer program.

(ii) If not, is it a human judgment whether to send additional solicitation mailpieces to undeliverable-as-addressed (UAA) addresses? What are the dominant factors resulting in a decision to mail again to a UAA address? What are the dominant factors resulting in a decision not to mail again to a UAA address?

(f) Will the “mailing decision process” differ as a result of the NSA? Explain fully.

OCA/COS-T1-31. Please refer to your response to OCA/COS-T1-25(a), which asks whether the term “updating” includes the activity “address suppression.”

(a) Considering Capital One’s current practices with respect to “[i]nformation that a mailpiece has been returned for a particular address,” under what circumstances (if any) is address suppression used with respect to subsequent First-Class solicitation mail marketing campaigns? Please explain.

(b) Considering Capital One’s practices under the NSA with respect to an electronic notification that a mailpiece has been “returned” for a particular address, under what circumstances (if any) will “enhanced address suppression on subsequent [First-Class solicitation] mailings” be used, as stated in COS-T-1, at 6, line 16? Please explain.

OCA/COS-T1-32. Please refer to your response to OCA/COS-T1-24.

- (a) Currently, how often (i.e., daily, weekly, monthly, some other regular period, or periodically) does the third-party vendor transmit “mailpiece identification data” to Capital One?
- (b) Currently, how much time typically elapses between the receipt of the third-party vendor transmission of mailpiece identification data and the updating of Capital One’s address databases? Please explain.
- (c) Currently, does the third-party vendor also transmit the reason stated on the face of the returned mailpiece that caused the return?
 - (i) If this is correct, does Capital One make use of the transmitted information concerning the cause of the returned mailpiece? Please explain.
 - (ii) If this is not correct, what are Capital One’s reasons for not making use of such transmitted information?
- (d) Because Capital One will receive electronic notifications pursuant to Change Service Requested (CSR), Option 2, under the NSA, is it fair to conclude that a reduction in the third-party vendor keying of mailpieces that would otherwise be returned is one of the cost reductions that will accrue to Capital One, and confirmed in response to OCA/COS-T1-3(b)? Please explain.