

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 UNITED STATES POSTAL SERVICE
WITNESS MICHAEL K. PLUNKETT
(OCA/USPS-T2-37-38)
November 27, 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/USPS-T2-37. Please refer to your response to OCA/USPS-T2-26(a)-(b).

- (a) Please explain why collecting data on Capital One's volume of undeliverable-as-addressed (UAA) First-Class solicitation mail that is forwarded should not be part of the data collection plan.
- (b) Please explain why collecting data on the number of electronic Address Change Service (ACS) notifications provided to Capital One for UAA First-Class solicitation mail that is forwarded should not be part of the data collection plan.

OCA/USPS-T2-38. Please refer to your response to OCA/USPS-T2-33(a)-(b), where you confirm that the proposed Domestic Mail Classification Schedule (DMCS) for the Capital One Negotiated Service Agreement (NSA) does not impose a requirement on Capital One to receive address correction information. Also, please refer to the response of the Postal Service to OCA/USPS-8(a)-(b), which states "Not confirmed to the extent that this question implies that Capital One determines the time at which the transmission of information will take place. Address changes are sent automatically, and no intervention on the part of Capital One is necessary to complete the exchange." Please reconcile or clarify these two statements.