

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-T1-33-35)
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/COS-T1-33. Please refer to the response of witness Crum to POIR No. 2, question 7. Witness Crum states that “pursuant to the NSA, Capital One receives corrected address information frequently and must act on it almost immediately (within two days).”

- a. Is this statement consistent with your understanding of the requirements of the NSA with respect to electronic notification of forwarding? If not, what is your understanding of Capital One’s obligation under the NSA with respect to electronic notification of forwarding that it will receive from the Postal Service?
- b. Is the obligation under the NSA with respect to electronic forwarding information different from Capital One’s obligation under the NSA with respect to electronic returns? If so, how?

OCA/COS-T1-34. Please refer to the response of witness Crum to POIR No. 2, question 7. Witness Crum states that he seeks to develop an estimate of cost savings resulting from “Capital One’s incorporation into mailing lists of electronic address *corrections*.” [Emphasis added.] In your response to interrogatory OCA/COS-T1-21(a), you stated, “Capital One understands that it will regularly receive electronic files of ACS information from the USPS. The company will update the relevant solicitation databases with the information from this file within two days of receipt.”

- a. Will Capital One *correct* addresses in its solicitation address databases based on electronic notification of forwarding within two days of receipt? If not, why not?

- b. Will Capital One *correct* addresses in its solicitation address databases based on electronic notification of forwarding within some other time of receipt? If so, what is the time period? If not, why not?
- c. How will Capital One *correct* addresses in its solicitation address databases based on electronic notification of forwarding within two days of receipt?
- d. Please confirm that the software that Capital One has acquired for updating its solicitation databases (OCA/COS-T1-21) does not *correct* addresses. If you do not confirm, please describe the operation of the software in sufficient detail to demonstrate that it does *correct* addresses.
- e. Does Capital One currently use any method other than NCOA to *correct* addresses in its solicitation databases? If so, please list the other methods and describe how they *correct* addresses in its solicitation databases.

OCA/COS-T1-35. Please refer to the response of witness Crum to POIR No. 2, question 7. Witness Crum states that “Capital One now has a comparatively high rate of *repeat* forwards” [Emphasis added.]

- a. Do you agree with this statement? If so, what is the basis for your agreement?
- b. Please confirm that these repeat forwards must occur in a 60-day period between NCOA updates. If you do not confirm, please explain.
- c. What was the total number of First-Class solicitation mailings (as opposed to piece volumes) of Capitol One in 2000, 2001, and 2002?

- d. What was the largest number of First-Class solicitation mailings (as opposed to piece volumes) of Capitol One in any one period between NCOA updates in 2000, 2001, and 2002?