

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 CHARLES L. CRUM  
(OCA/USPS-T3-28-30)  
November 27, 2002

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Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits 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-T3-28. Please refer to your response to POIR No. 2, question 7. You “project[] Capitol One’s annual solicitation volume over the number of domestic delivery points . . . .”

- a. Please confirm that the assumption that Capitol One mails to every domestic delivery point implies that Capital One mails to every domestic delivery point with a forwarding order in effect at any time during the year. If you do not confirm, please explain.
- b. How many forwarding orders were in effect at any time during the fiscal years 2000, 2001, and 2002?
- c. How many domestic *residential* delivery points were there in fiscal years 2000, 2001, and 2002?
- d. How many forwarding orders were in effect at any time during the fiscal years 2000, 2001, and 2002 for domestic *residential* delivery points?

OCA/USPS-T3-29. Please refer to your response to POIR No. 2, question 7. You state, “Capital One’s forwarding rate should . . . decline substantially during the test year.”

- a. Is it your understanding that Capital One intends to *correct* addresses in its solicitation databases within two days of receipt of electronic notification of forwarding? If so, what is the basis for your belief?
- b. Is it your understanding that Capital One is required under the terms of the NSA to *correct* (as opposed to “update”) addresses in its solicitation databases within

two days of receipt of electronic notification of forwarding? If so, what is the basis for your belief?

OCA/USPS-T3-30. Please refer to your response to POIR No. 2, question 7. Your estimate of costs avoided appears to assume the avoidance of between 10.5 million (12,794,880 – 2,293,782 = 10,501,098) and 2,223,782 million forwards.

- a. Is this correct? If not, please state the correct assumption.
- b. Are these “repeat” forwards? If not, please explain.
- c. Is Capital One required under the NSA to continue to correct its solicitation addresses every 60 days using NCOA? If not, what are Capital One’s obligations under the NSA with respect to correcting its solicitation addresses on a periodic basis?
- d. Please confirm that there are approximately six 60-day periods in a calendar year.
- e. Please confirm that most of Capital One’s “repeat” forwards are eliminated through use of NCOA updating. If you do not confirm, please provide your estimate of forwards not eliminate through use of NCOA updating and show its derivation.
- f. Please confirm that a First-Class solicitation mailing that is sent immediately after NCOA updating should generate almost no forwards (because all the addresses have just been corrected). If you do not confirm, please explain.
- g. Please confirm that a First-Class solicitation mailing that is sent immediately after NCOA updating would generate the most “repeat” forwards (e.g., almost none)

because there would be almost 60 days in which to remail to the same incorrect addresses. (*E.g.*, “Almost no” forwards times “a few” mailings over the next 60 days equals “almost none.”) If you do not confirm, please explain.

- h. Please confirm that a First-Class solicitation mailing that is sent immediately before NCOA updating should generate the most forwards. If you do not confirm, please explain.
- i. Please confirm that a First-Class solicitation mailing that is sent immediately before NCOA updating would generate the fewest “repeat” forwards (*e.g.*, almost none) because there would be virtually no time in which to remail to the same addresses. If you do not confirm, please explain.
- j. Please explain why “Capitol One now has a comparatively high rate of repeat forwards . . .” when it currently corrects its solicitation addresses every 60 days.
- k. Please confirm that the provision of free electronic notification of forwarding to a mailer that updates its addresses with NCOA is of virtually no additional value to the Postal Service because it prevents virtually no repeat forwards. If you do not confirm, please explain.