

**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 CAPITAL ONE SERVICES, INC.
WITNESS DONALD JEAN TO FOLLOW-UP INTERROGATORIES OF
OFFICE OF THE CONSUMER ADVOCATE
OCA/COS-T1-34(a), (b) and (e), and 35 (a), (b) , (c) and (d)**

Capital One Services, Inc hereby provides the responses of witness Donald Jean to the following follow-up interrogatories of Office of the Consumer Advocate:
OCA/COS-T1-34(a), (b) and (e), and 35 (a), (b), (c) and (d), filed on November 27, 2002.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted

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Dated: December 6, 2002

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?
- 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.

ANSWER

- a. Yes, the company intends to update its address records, and will include the new address in its information base, and use that new address to the extent permitted by law.
- b. Not applicable based on answer to (a).
- e. Yes, the company does use other methods to improve address hygiene. One such program is GroupOne software, which is a tool to improve address formats, zip codes, etc.

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?

ANSWER

- a. The company has no way to know what mail is forwarded today, so it is impossible to agree or disagree with Mr. Crum’s statement.
- b. The company does not have information about “repeat” forwards, but, given that NCOA is a “perfect match” system, it is likely that such forwards could occur despite frequent NCOA processing.
- c. The company needs clarification of the term “solicitation mailings” in this context before it can attempt to quantify the number of mailings.
- d. As testified, the company utilizes the NCOA matching process at multiple points in its solicitation process. Therefore, the meaning of this question is unclear.