

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001**

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**EXPERIMENTAL RATE AND SERVICE  
CHANGES TO IMPLEMENT NEGOTIATED  
SERVICE AGREEMENT WITH  
CAPITAL ONE SERVICES, INC.**

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**DOCKET No. MC2002-2**

**CAPITAL ONE SERVICES, INC.'S OBJECTION  
TO OFFICER OF THE COMMISSION INTERROGATORY  
TO WITNESS DONALD JEAN - OCA/COS-T1-34(c) and (d),**

Capital One Services, Inc hereby objects to the Interrogatory of the Office of Consumer Advocate (OCA): OCA/COS-T1-34(c) and (d), filed on November 27, 2002.

The interrogatory is stated verbatim and is followed by an explanation of the objection.

Respectfully submitted

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Dated: December 6, 2002

**OCA/COS-T1-34(c) and (d).**

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.”

- 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.

**OBJECTION**

- c. Questions about the specific mechanics of Capital One’s address management processes are of questionable relevance. Moreover, the company considers such specifics to be proprietary.
- d. The company has not “acquired” software to update its addresses; rather, it has built such programs internally. The company has testified that it has both the ability and the intention to update addresses for future marketing campaigns. Beyond this, specific descriptions of software operation lack relevance. Moreover, the company considers such specifics to be proprietary