

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 UNITED STATES POSTAL SERVICE WITNESS PLUNKETT
TO INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS CRUM
(OCA/USPS-T3-30(c))

The United States Postal Service hereby provides the response of witness Plunkett to the following interrogatory of Office of the Consumer Advocate: OCA/USPS-T3-30(c), filed on November 27, 2002, and redirected from witness Crum.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Scott L. Reiter

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December 12, 2002

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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.

- 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?

RESPONSE:

- c. See the Agreement section IIC. Capital One agrees to continue updating its address lists, although they are not bound specifically to the use of NCOA.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Scott L. Reiter

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