

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
TO INTERROGATORY OF NEWSPAPER ASSOCIATION OF AMERICA
(NAA/USPS-10)

The United States Postal Service hereby provides its response to the following interrogatory of Newspaper Association of America: NAA/USPS-10, filed on December 3, 2002.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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December 17, 2002

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF NEWSPAPER ASSOCIATION OF AMERICA

NAA/USPS-10: Please refer to the response provided by the Postal Service to interrogatory NAA/USPS-T4-13, redirected from witness Wilson and filed on November 26, in which the Postal Service states: Capital One's returned mail pieces are routed through the Richmond ADC.

Please explain what is meant by "routed through" as distinct from "routed to" and explain what happens to the returned mail pieces once they arrive at the Richmond ADC, including whether they are routed onward to some other destination.

Response:

What was meant by the response to NAA/USPS-T4-13 is that Capital One return mail pieces have ZIP Codes that destinate within the Richmond service area. The type of handling they receive and where they receive it is determined by the Richmond P&DC

The type of handling that Capital One return mail receives could depend on several factors, including their automatability and the extent of intermingling with non-Capital One returns destinating in the Richmond area. This May, when several headquarters personnel visited the area, the Processing and Distribution Center often transported Capital One returns to an annex facility where postal employees would manually riffle the mail to remove pieces that should not be returned to Capital One. Now, apparently, all handling, whether automated or manual, occurs at the Richmond P&DC.

It should be remembered that the actual handling practices were not relied upon to develop cost or savings estimates in this case, so that any changes in operations in this regard have no effect on the cost or savings estimates underlying this case.

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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