

**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**

**FOURTH INTERROGATORY OF CAPITAL ONE SERVICES, INC.  
TO OFFICE OF THE CONSUMER ADVOCATE  
WITNESS JAMES F. CALLOW (OCA-T2-17)**

Capital One Services, Inc (COS) hereby requests Office of the Consumer Advocate to respond fully and completely to the following interrogatories and requests for production of documents pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure.

Respectfully submitted

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Dated: January 22, 2003

**COS/OCA-T2-17.** Please refer to your response to COS/OCA-T2-8 where you indicate that the Postal Service may not authorize a mailer access to the volume-based declining block rates unless “there is a reasonable expectation that any mailer so authorized will make an additional contribution to institutional costs.” Also, please refer generally to pages 26 to 33 of your testimony and specifically to pages 26 and 27 of your testimony where you state, “I have considered the relevant classification criteria with respect to my development of the proposed classifications for Experimental Automated Address Correction Service and Experimental Volume-Based Declining Block Rates.”

- (a) Do you believe that making an additional contribution to institutional costs is the only criterion that the Commission should consider when evaluating an NSA or experimental classification? If not, do you believe that the Commission should consider all of the criteria listed on pages 26 and 27 of your testimony when evaluating an NSA or niche classification?
  
- (b) For each criterion that you considered with respect to your proposed classifications for Experimental Automated Address Correction Service and Experimental Volume-Based Declining Block Rates, please indicate whether your discussion of the criterion (on pages 26 to 33 of your testimony) with respect to your proposed classifications also applies to the Capital One NSA. For each criterion for which your discussion does not apply to the Capital One NSA, please explain why it does not apply.