

**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**

**FIFTH INTERROGATORY OF CAPITAL ONE SERVICES, INC.  
TO NEWSPAPER ASSOCIATION OF AMERICA  
WITNESS CHRISTOPHER D. KENT (NAA-T1-34)**

Capital One Services, Inc (COS) hereby requests Newspaper Association of America to respond fully and completely to the following interrogatory 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 23, 2003

**COS/NAA-T1-34.** Please refer to your response to COS/NAA-T1-21 and further to lines 5-14 on Tr. 3/639 where witness Wilson states, “I can share with you some historical data about NCOA match rates over the 15 or 16 years of its life cycle. It typically corrects a 4 percent match rate...When that is contrasted with what the Bureau of the Census reports as the typical move rate of American public at 17 percent, I think it indicates that NCOA is capable on average of correcting 4 percent of what would be a 17 percent population, or roughly 25 percent of the potential change of address.” Finally, please refer to third page of USPS witness Crum’s response to POIR No. 3, Question 1 where he states, “Capital One processes its lists through the National Change of Address database (NCOA) every 30 days for customer mail and 60 days for solicitation mail. This occurs far more frequently than most mailers who process lists every 180 days, the minimum specified by postal regulation.”

- (a) Please confirm that the above quoted citation from Tr. 3/639 is the source of your statement that “75% will not be caught by NCOA.” If not confirmed, please provide the appropriate citation.
- (b) If Capital One sends a First-Class solicitation to an address that was not “caught by NCOA”, will that piece be forwarded, returned, or could it be either? Please explain your response fully.
- (c) Please confirm that the 17 percent move rate cited by witness Wilson is an annual rate. If not confirmed, please explain your response fully.
- (d) Please confirm that if the annual move rate is 17 percent, the move rate over a 180 day period is approximately 8.5 percent. If not confirmed, please explain fully.
- (e) Please confirm that processing lists against NCOA every 180 days is the minimum specified by postal regulation. If not confirmed, please explain fully.

Please confirm that at least one mailer, Capital One, processes its lists against NCOA more frequently than every 180 days. If not confirmed, please explain fully.