

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001**

Rate and Service Changes To Implement)
Functionally Equivalent Negotiated Service) Docket No. MC2004-3
Agreement with Bank One Corporation)

**OBJECTIONS OF BANK ONE CORPORATION TO
VALPAK INTERROGATORY
VP/BOC-T1-14
(July 22, 2004)**

Bank One Corporation (“Bank One”) hereby submits its objections to Valpak Direct Marketing Systems, Inc. and Valpak Dealers’ Association, Inc. (collectively “Valpak”) interrogatory VP/BOC-T1-14, filed July 14, 2004. The question is restated verbatim, and then followed by Bank One’s objections.

VP/BOC-T1-14.

- a. Please explain why Bank One would need address correction service for its First-Class solicitation mail, when it does not need address correction service for its Standard Mail solicitations.
- b. Please explain all ways in which Bank One utilized information from its First-Class solicitation mail that was returned physically (or manually) during 2003. That is, did it use returned mail pieces to correct its solicitation mail lists? If not, what did Bank One do with returned mail?
- c. During 2003, for how long a period, on average, did Bank One retain returned solicitation mail before it was disposed of?
- d. Assuming that the proposed Negotiated Service Agreement (“NSA”) is approved and implemented, please explain all ways in which Bank One plans to utilize the electronic return information that it will receive under the NSA.
- e. After the electronic information is utilized in whatever manner you described in your response to preceding part d, please explain (i) how long Bank One anticipates retaining such electronic data, and (ii) what other plans, if any, Bank

One has for utilizing such electronic data (e.g., sharing the information with list providers).

OBJECTION:

Bank One objects that the information requested by this interrogatory is highly proprietary. Information on the mail solicitation strategies of a credit card company is among the most commercially sensitive of information in the industry. Bank One further objects that the requested information is not reasonably calculated to lead to the production of relevant or admissible evidence. Without waiving these objections, Bank One will answer the question to the extent possible without disclosing proprietary information.

Respectfully submitted,

/s/

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July 22, 2004

CERTIFICATE OF SERVICE

I hereby certify that I have today caused the foregoing document to be served in accordance with Section 12 of the Commission's Rules of Practice

/s/

Joy M. Leong

July 22, 2004