

UNITED STATES OF AMERICA  
Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Experimental Changes to Implement )  
Capital One NSA )

Docket No. MC2002-2

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORY TO UNITED STATES POSTAL SERVICE  
WITNESS MICHAEL K. PLUNKETT  
(OCA/USPS-T2-36)  
November 15, 2002

---

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits an interrogatory and request for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-2 dated October 3, 2002, are hereby incorporated by reference.

Respectfully submitted,

---

SHELLEY S. DREIFUSS  
Director  
Office of the Consumer Advocate

EMMETT RAND COSTICH  
Attorney

1333 H Street, N.W.  
Washington, D.C. 20268-0001  
(202) 789-6830; Fax (202) 789-6819

OCA/USPS-T2-36. Please refer to your response to APWU/USPS-T1-1, redirected from witness Bizzotto, which states, in part:

My understanding is that Capital One places the updated information into a database that it maintains for its returns. Any address that Capital One uses for its First-Class Mail solicitations is then run against the return database.

- (a) What specific changes are made to address lists that are “run against the return database”?
- (b) Please provide documentation to support the statement quoted above.
- (c) If documentation is not available, please describe the basis for your understanding.
- (d) If documentation is not available, what information was provided to you, and who was the source of such information, upon which you based your understanding?