

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  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS ANITA J. BIZZOTTO  
(OCA/USPS-T1-4-9)  
October 25, 2002

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

Respectfully submitted,

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OCA/USPS-T1-4. Please refer to Section IV. of your testimony at pages 3-5, Customer-Specific Agreements. Please state, where, if at all, your testimony describes any effort by the USPS to obtain data applicable to mailers beyond Capital One during the course of the proposed Negotiated Service Agreement (NSA).

OCA/USPS-T1-5. Please refer to Section IV. of your testimony at pages 3-5, Customer-Specific Agreements. Please state when and whether the USPS has offered, or has offered to negotiate, similar NSA's to other mailers. If such offers have been made, what response did they receive?

OCA/USPS-T1-6. Please refer to Section V. of your testimony at pages 5-6, The Agreement With Capital One. Please explain why the USPS has agreed, in the NSA, to freeze the rate during the third year of the NSA's term.

OCA/USPS-T1-7. Please refer to Section V. of your testimony at pages 5-6, The Agreement With Capital One. Please provide your understanding of the role, if any, of the Postal Rate Commission in reviewing or overseeing decisions made by the USPS on appeals taken by Capital One pursuant to the NSA.

OCA/USPS-T1-8. Please refer to Section V. of your testimony at pages 5-6, The Agreement With Capital One. Please explain why, under the terms of the NSA, the USPS does not receive the authority to cancel the NSA upon thirty days notice, as Capital One is authorized to do.

OCA/USPS-T1-9. Please refer to page 2, line 12, through page 3, and line 23, of your prefiled testimony. Please explain why you consider individual-customer agreements to be a “natural next step in the evolution of postal pricing[.]”