

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

EXPERIMENTAL RATE AND SERVICE CHANGES  
TO IMPLEMENT NEGOTIATED SERVICE AGREEMENT  
WITH CAPITAL ONE SERVICES, INC.

Docket No. MC2002-2

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILSON TO  
INTERROGATORY OF AMERICAN POSTAL WORKERS UNION, AFL-CIO,  
REDIRECTED FROM WITNESS PLUNKETT  
(APWU/USPS-T2-8)

The United States Postal Service hereby provides the response of witness  
Wilson to the following interrogatory of American Postal Workers Union, AFL-CIO:  
APWU/USPS-T2-8, filed on October 31, 2002 and redirected from witness Plunkett.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 12, 2002

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INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO,  
REDIRECTED FROM WITNESS PLUNKETT

**APWU/USPS-T2-8.** On page 7 of your testimony, you state that any mailer whose return or forwarding volumes exceed the average imposes a larger cost burden than mailers whose return and forwarding volumes are below average. Can the Postal Service provide information on how much of Capital One's mail is forwarded? If so, please provide any and all data you have for any time period on how much of Capital One's mail is forwarded. Is the forwarding volume of Capital One's mail above average for First Class Mail? If Capital One's forwarding volume is above average, was that factor considered in determining the benefits to the Postal Service of creating a CSR Option 2, which, unlike Option 1, the current option, will forward mail that is forwardable, instead of destroying it, continuing the costs associated with Capital One's above average forwarding rate?

**RESPONSE:**

No, the Postal Service does not track an individual mailer's forwarding volume, thus it does not know how much of Capital One's mail is forwarded. While the Postal Service has no way of knowing Capital One's forwarding rate, it is likely at or below average because of Capital One's address management practices. Capital One processes its customer mail addresses through the National Change of Address (NCOA) database every 30 days and its solicitation mail addresses every 60 days. For First-Class mailers who use NCOA to comply with the Move Update requirement, the Postal Service only requires that databases be processed every 180 days. Since Capital One processes its address database through NCOA and does so at a rate more frequent than most mailers, I would anticipate that Capital One First-Class Mail is forwarded at or below the average forwarding rate.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Nan K. McKenzie

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