

Before the  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

Complaint of Capital One Services, Inc. )

Docket No. C2008-3

PUBLIC REPRESENTATIVE INTERROGATORIES TO  
CAPITAL ONE SERVICE, INC.  
(PR/COS-1-4)  
August 11, 2008

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Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Public Representative hereby submits interrogatories and requests for production of documents. Instructions included with Public Representative interrogatories PR/USPS-1-7 dated August 8, 2008, are hereby incorporated by reference.

Respectfully submitted,

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EMMETT RAND COSTICH  
Public Representative

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PR/COS-1. Please confirm that Capital One is currently a subscriber to Confirm service. If you do not confirm, please explain. If you do confirm, please identify the periods during which Capital One has been a Confirm Service subscriber.

PR/COS-2. For Fiscal Years 2006, 2007 and 2008, please provide the average read and accept rates for Capital One's First-Class Mail and Standard Mail.

PR/COS-3. Please refer to 39 U.S.C. §3622(c)(10), which references "the desirability of special classifications . . . including agreements between the Postal Service and postal users, when available on public and reasonable terms to similarly situated mailers." With respect to the Bank of America NSA as implemented, please discuss all the ways in which Capital One is a mailer that is "similarly situated" to Bank of America.

PR/COS-4.

- a. Please confirm that the systemwide average read and accept rates for First-Class Mail and Standard Mail specified in the Bank of American NSA as implemented were weighted by Bank of America's mail mix. If you do not confirm, please explain.
- b. In seeking to enter into a functionally equivalent NSA with the Postal Service, is Capital One requesting use of the specified First-Class Mail and Standard Mail read and accept rates in the Bank of America NSA as implemented, the systemwide average read and accept rates from Docket No. R2006-1, USPS-LR-L-110 for such classes weighted by Capital One's mail mix, or the systemwide average read and accept rates from Docket No. MC2007-1, USPS-LR-4 for such classes weighted by Capital One's mail mix? Please explain.