

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

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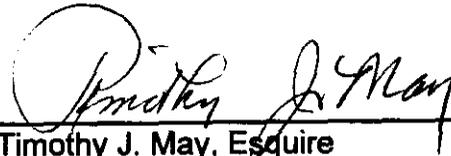
POSTAL RATE AND FEE CHANGES

DOCKET NO. R2000-1

FIRST INTERROGATORIES OF E-STAMP CORPORATION
TO UNITED STATES POSTAL SERVICE
WITNESS CHRIS CAMPBELL (USPS-T29-1 and 2)

E-Stamp Corporation (E-Stamp) requests United States Postal Service to respond fully and completely to the following interrogatories and requests for production of documents pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure.

Respectfully submitted,



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Counsel for E-Stamp Corporation

Dated: February 15, 2000

**INTERROGATORIES OF E-STAMP CORPORATION
TO UNITED STATES POSTAL SERVICE WITNESS CAMPBELL**

E-STAMP/USPS-T29-1

On page 40 of your testimony you state that the cost avoided by a QBRM piece is 3.38¢, compared to a handwritten single-piece letter as a benchmark, citing USPS LR-I-160, Section L.. Please provide the cost avoidance for a QBRM piece if the benchmark used is that of metered mail.

E-STAMP/USPS-T29-2

Your testimony, at page 38, states that a QBRM mail piece is defined as BRM letters and cards "which are automation compatible, have both a FIM C and a unique zip+4-bar code, and have qualified for BRMAS processing."

(a) Please confirm that Information Based Indicia (IBI) First Class Mail, using the E-Stamp Internet postage solution, as approved by the Postal Service, also is automation compatible, has a FIM Code, a verified address, a current USPS approved nine-digit Zip Code, and a Delivery Point Barcode.

(b) Please identify any features of E-Stamp Internet postage First Class letters or cards which have any characteristics different than QBRM which could cause the Postal Service to incur either greater costs or lesser costs than QBRM.

(c) Based upon your responses to (a) and (b) above, please state your opinion as to whether the amount of QBRM cost avoidance, which you, on page 39, define as the difference in mail processing costs between a prebarcoded First-Class Mail piece and a handwritten First-Class Mail piece, would be at least no greater than

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the cost avoidance of E-Stamp Internet postage FCM. Please explain any negative answer.

(d) Table 7 on page 39 of your testimony presents what you say are "simple assumptions" that adapt witness Miller's model so that you can model QBRM and handwritten mail flows. Would this comparison be equally applicable to E-Stamp Internet postage First Class Mail? Please explain any negative answer.

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.



Timothy J. May

Dated: February 15, 2000