

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**POSTAL RATE AND FEE CHANGES**

**DOCKET NO. R2000-1**

**FIRST INTERROGATORIES OF E-STAMP CORPORATION  
TO UNITED STATES POSTAL SERVICE  
WITNESS FRONK (USPS-T33-1 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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Dated: February 15, 2000

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

**E-STAMP/USPS-T33-1**

On page 23 of your testimony you describe QBRM mail as clean, pre-barcoded mail. You say this type of mail is used daily by millions of individuals and small businesses and that, by recognizing the cost savings associated with such mail, the Postal Service is able to permit a broader base of customers to share more directly in the benefits of automation. Internet postage with Information Based Indicia (IBI) is also clean, pre-barcoded mail that incurs less costs than non-barcoded mail. Currently the Postal Service has approved two vendors of this type of Internet postage, and two more are in beta testing. Would not a discount in recognition of the cost savings associated with this type of mail also permit a broader base of customers to more directly share in the benefits of automation, much as you describe is the case with QBRM?

**E-STAMP/USPS-T33-2**

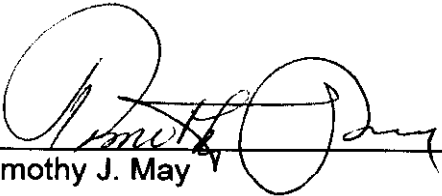
In your Attachment 33B, on page 46 of your testimony, you provide the costs for First Class Mail Before and After Rates, both for the letter and card sub-class.

(a) In calculating the before and after rate costs for the non-presorted letters and single piece cards, did you assume that any of these letters and cards would be Internet postage mail with destination point barcodes, that is, mail utilizing the IBI indicia, such as the Postal Service has currently approved for E-Stamp and Stamps.com, and which is currently in beta testing by Pitney Bowes and Neopost?

(b) If the answer to (a) is in the affirmative, please supply your estimate of the volumes, costs and revenues of that category of mail, before and after rates, and the assumed unit costs for that category of FCM letters and cards.

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.

  
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Timothy J. May

Dated: February 15, 2000