

Before the  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

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OFFICE OF THE SECRETARY

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Postal Rate and Fee Changes, 2000

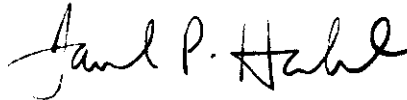
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Docket No. R2000-1

**FIRST INTERROGATORIES OF STAMPS.COM  
TO WITNESS CAMPBELL (STAMPS.COM/USPS-T29-1-6)**

Pursuant to sections 25 and 26 of the Rules of Practice, Stamps.com directs these interrogatories to USPS witness Chris Campbell. If the witness is unable to respond to any portion of these interrogatories, please provide an appropriate USPS witness capable of providing an answer.

Respectfully submitted,



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*Counsel for Stamps.com*

Dated: February 25, 2000

**INTERROGATORIES OF STAMPS.COM TO  
USPS WITNESS CAMPBELL**

**STAMPS.COM/USPS T-29-1**

*[This interrogatory generally follows the E-STAMP/USPS-T29-2 interrogatory, but makes the interrogatory applicable to all IBI providers, including Stamps.com.]*

Reference your testimony, at page 38, that 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 barcode, and have qualified for BRMAS processing.” Reference also USPS’s Information Based Indicia (IBI) program, which sets out the address verification, correction, and printing requirements for IBI mail.

(a) Please confirm that all Information Based Indicia (IBI) First Class Mail, like QBRM mail, is automation compatible, has a FIM Code, has a verified address, has a current USPS approved nine-digit ZIP Code, and has a Delivery Point Barcode. If you disagree, please explain why.

(b) Please identify all features of any USPS-approved IBI postage for First Class letters or cards which have any characteristics that differ from QBRM in such a way that it could cause the Postal Service to incur either greater costs or lesser costs than QBRM.

(c) Please state and explain your opinion as to whether the amount of QBRM cost avoidance for mail processing (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 any greater or lesser than that for USPS-approved IBI First-Class mail letters or cards.

(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 these assumptions be equally applicable to all USPS-approved IBI postage for First Class Mail? Please explain any negative answer.

**STAMPS.COM/USPS T-29-2**

Reference your testimony on page 38. Please confirm that the proposed discount for QBRM is based solely on the cost avoidance that results from the difference in mail processing costs between a preapproved prebarcoded First-Class Mail piece and a handwritten First-Class Mail piece. If the discount is based on any additional cost avoidance factors, please explain and quantify the cost avoidance for each additional factor.

**STAMPS.COM/USPS T-29-3**

Please explain why the Postal Service, in both this rate case and in R97-1, considers the appropriate benchmark for measuring QBRM cost avoidance to be the cost associated with processing a handwritten First Class mail piece.

**STAMPS.COM/USPS T-29-4**

Please confirm that the proposed QBRM per-piece service fees (\$0.03 per piece with quarterly fee, \$0.06 per piece without quarterly fee) are intended to cover only the costs associated with counting, rating, and billing QBRM for customers and are not intended to cover any part of the mail processing costs of QBRM mail. If the QBRM per-piece service fees are intended to cover any portion of mail processing costs, please explain and quantify.

**STAMPS.COM/USPS T-29-5**

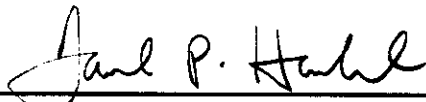
Please confirm that the proposed QBRM Permit and Accounting Fees are intended to cover only the costs associated with issuing the permit, and accounting and administering advance deposit accounts, and are not intended to cover any part of the mail processing costs of QBRM mail. If these proposed fees are intended to cover any portion of mail processing costs, please explain and quantify.

**STAMPS.COM/USPS T-29-6**

Please confirm that the proposed 3 cent discount for QBRM does not take into account any cost savings that result from QBRM mail not needing the application of a postage stamp, thus avoiding the costs associated with printing, distributing, and selling stamps. If the proposed 3 cent QBRM discount does take into account such cost savings, please explain and quantify.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 25 day of February 2000, served the foregoing document in accordance with the Commission's Rules of Practice.

  
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David P. Hendel