

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

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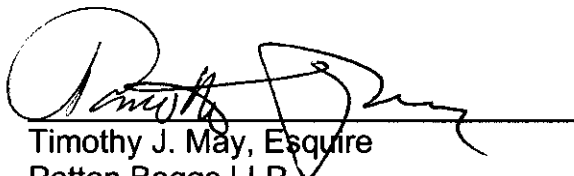
POSTAL RATE AND FEE CHANGES

DOCKET NO. R2000-1

**SECOND INTERROGATORIES OF E-STAMP CORPORATION
TO UNITED STATES POSTAL SERVICE
WITNESS FRONK (USPS-T33-3, 4 and 5)**

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: March 8, 2000

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TO UNITED STATES POSTAL SERVICE WITNESS FRONK**

E-STAMP/USPS-T33-3

In your response to E-Stamp/USPS-T33-1, you say that "IBI Mail is not homogenous," and further that "this lack of homogeneity makes it more difficult to measure the cost savings to the Postal Service from processing and IBI Mail piece."

(a) Please explain why the non-homogeneity of IBI Mail makes it more difficult to measure the cost savings from processing an E-Stamp or Stamps.com IBI Mail piece?

(b) Has the fact that First-Class Letter Mail is not homogenous, as you use the word in the above cited answer, made it difficult to measure the cost savings to the Postal Service from presorted First-Class Letters, including each of the rate categories thereunder?

E-STAMP/USPS-T33-4

In your answer to E-Stamp/USPS-T33-1 you state that a discounted postage rate for IBI "would potentially create an incentive for mailers to throw away their courtesy envelopes in favor of making their own envelopes with a discounted rate."

(a) Are you aware that E-Stamp and Stamps.com charge a service fee that approximates 10% of the face value of the postage?

(b) Please explain why a mailer would throw away a courtesy reply envelope or card and substitute an IBI envelope or card when the cost of the IBI service fee would approximate the discount on the IBI rate, and further explain why the customer would

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want to go to the trouble and expense of providing an envelope or a card when one has already been prepared for him as a courtesy reply.

E-STAMP/USPS-T33-5

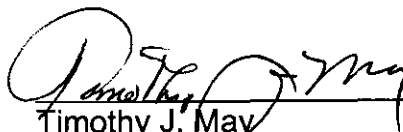
In your response to E-Stamp/USPS-T33-1 you state that the Postal Service "would need to reflect on revenue/enforcement issues, since single-piece mail bypasses the acceptance procedures in place to ensure that Bulk Mail meets the mail preparation requirements needed to qualify for a discount."

(a) Is it not the case that current handwritten and metered First-Class Mail Letters also bypass acceptance procedures and create revenue/enforcement issues?

(b) Do you have any reason to believe that users of IBI postage would engage in misapplication of the correct postage for the letter being mailed to any greater or lesser extent than current mailers of single-piece handwritten and metered mail? Please explain any affirmative answer.

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the Postal Service by hand and by First-Class Mail upon all participants in this proceeding requesting such service.


Timothy J. May

Dated: March 8, 2000