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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Before the
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

**SECOND SET OF INTERROGATORIES OF STAMPS.COM
TO WITNESS FRONK (STAMPS.COM/USPS T-33-7- 9)**

Pursuant to sections 25 and 26 of the Rules of Practice, Stamps.com directs this interrogatory and document production request to USPS witness David Fronk. If the witness is unable to respond to any portion of these request, please provide an appropriate USPS witness capable of providing an answer.

Respectfully submitted,



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Dated: March 16, 2000

**SECOND SET OF INTERROGATORIES OF STAMPS.COM TO
USPS WITNESS FRONK**

STAMPS.COM/USPS T-33-7

Reference your answer to E-Stamp/USPS-T-33-1, wherein you state that IBI mail is not homogenous because the IBI indicia produced by Simply Postage is not accompanied by mail that is barcoded or checked for address hygiene.

- (a) How does the lack of address checking and barcoding of mail that uses Simply Postage's IBI service affect providing a discount for an IBI service that *does* require address hygiene and barcoding (such as that provided by Stamps.com and E-Stamp)?

STAMPS.COM/USPS T-33-8

Reference your answer to E-Stamp/USPS-T-33-1, wherein you state that customers might use their own envelope and IBI postage instead of the courtesy reply envelope provided by mailers, which would "raise the ire" of businesses who sent the envelopes.

- (a) Does the Postal Service have any estimate of how frequently customers would apply IBI postage to their own envelopes instead of using the courtesy reply envelope? If so, please state such estimate and the basis for it.
- (b) Does the Postal Service have any estimate of the number or percentage of those businesses whose ire would be raised by customer use of IBI postage and their own envelope instead of the provided courtesy reply envelope? If so, please state such estimate and the basis for it.

STAMPS.COM/USPS T-33-9

Reference your answer to E-Stamp/USPS-T-33-1, wherein you state that USPS is "optimistic about the prospects for IBI." Please explain what prospects concerning IBI that USPS is optimistic about, and why.

CERTIFICATE OF SERVICE

I hereby certify that I have this 16 day of March 2000, served the foregoing document in accordance with the Commission's Rules of Practice.


David P. Hendel