

Before the
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

RECEIVED

MAR 16 4 59 PM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY


Postal Rate and Fee Changes, 2000

Docket No. R2000-1

**SECOND SET OF INTERROGATORIES OF STAMPS.COM
TO WITNESS CAMPBELL (STAMPS.COM/USPS T29-7-11)**

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,



David P. Hendel
Wickwire Gavin, PC
8100 Boone Blvd., Suite 700
Vienna, VA 22182-2642
Tel.: (703) 790-8750
Fax.: (703) 448-1767 or 448-1801
E-mail: Dhendel@wickwire.com

Counsel for Stamps.com

Dated: March 16, 2000

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

STAMPS.COM/USPS T-29-7

Referencing a document supporting your testimony, Library Reference USPS LR-I-160, Section L, Cost Avoidance Calculation for QBRM Discount, please confirm the following statements. If you disagree with any statement, please explain why.

- (a) Your calculated savings include savings in the video capture process.
- (b) Your calculated savings include savings in the OCR process, including benefits from mail quality.
- (c) Your calculated savings do not include any savings in the production and distribution of stamps.
- (d) Your calculated savings do not include any savings in the cancellation process.
- (c) Your calculated savings do not include any savings in forwarding mail to another address or returning it to sender.

STAMPS.COM/USPS T-29-8

Please provide any studies on the costs of handling, processing, forwarding and/or returning First-Class Mail necessitated by an improper address.

STAMPS.COM/USPS T-29-9

Reference your answer to Stamps.com/USPS-T29-1, wherein you state that IBI mail users may produce barcodes and indicia that postal automation equipment may have difficulty processing, or that such barcodes, indicia, and FIM markings may be printed outside the acceptable read zones for automation processing.

- (a) Does the Postal Service have an actual or estimated number for the amount or percentage of IBI First Class mail which postal automation equipment has difficulty processing, or for which a FIM code is non-existent or misplaced? If yes, please provide such figures and the studies upon which they are based.
- (b) Has the Postal Service conducted any studies, or compiled any data, on the extent to which IBI First Class mail users produce barcodes and indicia that postal automation equipment may have difficulty processing, or for which a FIM code is

non-existent or misplaced? If so, please provide such information.

- (c) Is the Postal Service currently conducting any studies, or compiling any data, on the extent to which First Class IBI mail users produce barcodes and indicia that postal automation equipment may have difficulty processing, or for which a FIM code is non-existent or misplaced? If so, please describe the studies or data compilation that is being done.

STAMPS.COM/USPS T-29-10

Has the Postal Service conducted or sponsored any studies or estimates of the amount of IBI mail expected to be entered into the mail stream in future years? If so, please provide a copy of all such studies and estimates.

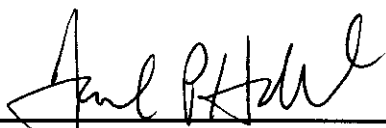
STAMPS.COM/USPS T-29-11

Reference your answer to Stamp.com/USPS-T29-1(c), wherein you state that the Postal Service “will continue to look into the issues presented above” concerning a discount for IBI mail that is comparable to the QBRM discount.

- (a) What has USPS done to date to “look into” this issue?
- (b) What specific actions does USPS contemplate taking in the future to look into this issue?

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