

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

RECEIVED

MAR 30 4 45 PM '00

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS FRONK  
TO INTERROGATORIES OF STAMPS.COM  
(STAMPS.COM/USPS-T33-7 THROUGH 9)

The United States Postal Service hereby provides the responses of witness Fronk to the following interrogatories: STAMPS.COM/USPS-T33-7 through 9 (filed on March 16, 2000).

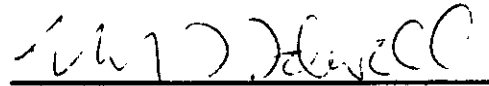
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998 Fax -5402  
March 30, 2000

**RESPONSE OF U.S. POSTAL SERVICE WITNESS FRONK TO  
INTERROGATORIES OF STAMPS.COM**

**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)?**

**RESPONSE:**

- (a) Please see my response to E-STAMP/USPS-T33-3.**

**RESPONSE OF U.S. POSTAL SERVICE WITNESS FRONK  
TO INTERROGATORIES OF STAMPS.COM**

**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.**

**RESPONSE:**

- (a) – (b) No. As I indicated in my response to STAMPS.COM/USPS-T33-4, the Postal Service's evaluation of the discount potential of IBI has been limited to a general, conceptual review. Accordingly, it has identified issues such as the potential incentive to discard courtesy reply envelopes, but has not studied such issues in detail.**

**RESPONSE OF U.S. POSTAL SERVICE WITNESS FRONK  
TO INTERROGATORIES OF STAMPS.COM**

**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.**

**RESPONSE: While I am not an IBI expert, what I was trying to convey in that response was that the Postal Service is optimistic about the role that IBI and PC Postage Products can play in fulfilling the Postal Service's vision of bringing the Post Office to the people, reaching customers where they are and how they work. The Postal Service is optimistic about the way in which these products can enhance the convenience of the mail and potentially increase the relative attractiveness of hard-copy mail as a communication medium. Also, the Postal Service is optimistic about the role these products can play in better meeting the needs of our customers.**

**DECLARATION**

I, David R. Fronk, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.



David R. Fronk

Dated: 3-30-00

**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.



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998 Fax -5402  
March 30, 2000