

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
STAMPS.COM WITNESS LAWTON  
(USPS/STAMPS.COM-T-3-1-3)

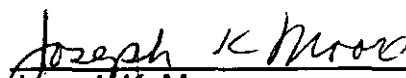
Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to Stamps.com witness Lawton: USPS/STAMPS.COM-T-3-1-3.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
\_\_\_\_\_  
Joseph K. Moore

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
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June 8, 2000

**USPS/STAMPS.COM-T3-1** Did you conduct any research that quantified the demographics of Stamps.com customers? (e.g., number of businesses/SOHOs/ households, industry classifications for businesses, number of employees, etc.)? If so, please list each demographic and provide all supporting data and documentation.

**USPS/STAMPS.COM-T3-2** Did you conduct any research that quantified the mail piece characteristics for the mail pieces to which postage has been applied using Stamps.com software? If so, please list each mail piece characteristic and provide all supporting data and documentation.

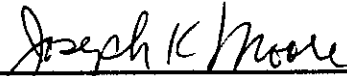
**USPS/STAMPS.COM-T3-3** On page 19 lines 6-7 of your testimony you state that "it is obvious that Stamps.com has completely changed how customers run their postal processes, and has the potential to significantly cut costs for the USPS while increasing patronage."

a. Please confirm that you did not conduct any cost studies as part of your testimony. If not confirmed, please explain.

b. Please confirm that you did not develop volume forecasts in the test year, or future years, for mail pieces processed using Stamps.com software. If not confirmed, please explain.

## 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.

  
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Joseph K. Moore

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