

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
E.STAMP & STAMPS.COM WITNESS BOGGS
(USPS/E & S-T-1-1-3)

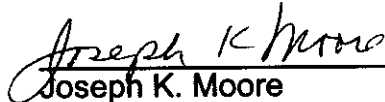
Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to E.Stamp and Stamps. com witness Boggs: USPS/E & S-T-1-1-3.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Joseph K. Moore

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June 8, 2000

USPS/E&S-T1-1 On page 17 lines 2-3 of your testimony you state "[s]mall businesses are interested in the idea of PC postage, with more than one PC owner in 10 very or somewhat interested in the concept." Does this not suggest an overwhelming majority of small business PC owners are neither "very" nor "somewhat" interested in the concept?

USPS/E&S-T1-2 On page 17 lines 10-11 of your testimony you state "[p]ricing was not associated with any of the solutions; just the general interest levels in the different concepts were measured."

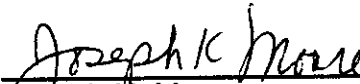
a. In your market research experience, have the specific prices associated with products had a direct influence on the level of interest in that product? If your response is affirmative to any degree, please explain why specific pricing information was not included in the research that supports your testimony.

b. Did your research gauge the interest level of small businesses and other PC postage users were a discounted rate to be offered? If not, why not?

USPS/E&S-T1-3 On page 25 lines 19-20 of your testimony you state that small businesses "will be the primary market for PC postage." Did you conduct any market research as to what types of mailers currently use PC postage products? If so, please provide copies of all documents generated in connection with such research.

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.



Joseph K. Moore

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