

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-1-4-8)

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-1-4-8.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Joseph K. Moore

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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June 13, 2000

USPS/E&S-T1-4 On page 9 you list the information in the IBI and state "IBI have the same information that is contained in the traditional postage meter indicia." Please confirm whether or not the following items are included in traditional postage meter indicia:

- a. Destination delivery point?
- b. Software ID?
- c. Ascending register/descending register?
- d. Algorithm ID?
- e. Digital Signature?
- f. Rate category?
- g. Indicia version number?
- h. Certificate serial number?

USPS/E&S-T1-5 On page 10 lines 10 and 11, you state that a potential benefit of PC Postage to the USPS is to "[r]educed the need for 'bricks and mortar' post offices to accommodate increasing small business volume." Please provide any research or studies that support this statement.

USPS/E&S-T1-6 On page 10 lines 12 and 13 you state that a potential benefit of PC Postage to the USPS is "[s]upport for PC-based mail applications that will contribute to significant growth in small business use of the mail for promotional purposes." On page 11 lines 8 and 9 you further state "[t]otal postage spending for both segments [small businesses and income-generating home offices] combined will be growing at 7.1% annually." Please confirm that this growth in postage spending was determined independently of the support for PC-based mail applications.

USPS/E&S-T1-7 On page 17 lines 9 through 11 you state "[i]t should be noted that these interest measures were collected in what was essentially a concept test rather than as a precise comparison. Pricing was not associated with any of the solutions; just the general interest levels in the different concepts were measured."

- a. Does the omission of pricing information for PC Postage products have an impact on the market research results presented in your testimony? If so, please describe the impact.
- b. Confirm that conducting the survey had an impact on respondents' awareness of PC Postage and thus on the market research results? If confirmed, please indicate the degree of the impact.

USPS/E&S-T1-8 On page 36 you include a chart of the "U.S. Small Business and Income-Generating Home Office PC Postage Spending, 1999-2003." This chart projects PC Postage spending on First Class Mail to be \$292.8 million in calendar year 2000.

- a. When was the study that led to these projections conducted?
- b. Have the results of the study been compared to actual PC Postage spending by small businesses and income-generating home offices? If so, what were the results?
- c. Confirm that the projected spending for year 2000 approximates the actual PC Postage spending to date? If not, provide justification for the disparity.