

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 WITNESS JONES
(USPS/E.STAMP-T-1-16)

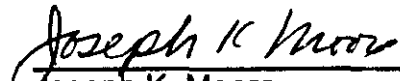
Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to E.Stamp witness Jones: USPS/E.STAMP-T-1-16.

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3078; Fax -5402
June 15, 2000

USPS/E-STAMP-T1-16

a. Please confirm that E-Stamp currently advertises "\$50 free postage" on its web site: <http://www.e-stamp.com>. If not confirmed, please explain.

b. Please list all such marketing programs (e.g., website promotions, magazine advertising, TV commercials, etc.) E-Stamp has used to offer customers free postage or total postage discounts. Include the date(s) and/or date ranges that these programs have been presented to the public.

c. On page 11 lines 9-11 of your testimony you state, "Unless a discount is offered, PC postage will not be able to attract enough customers to convert in order to establish this form of postage evidencing as a mainstream postage solution." However, as stated above, E-Stamp currently does offer customers a discount in the form of free postage. Please describe the extent to which this free postage offer, or the other marketing programs described in your response to (b), have been successful in attracting new customers to E-Stamp.