

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 HESELTON
(USPS/STAMPS.COM-T-1-18)

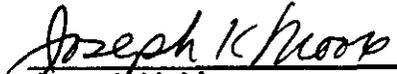
Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to Stamps.com witness Heselton: USPS/STAMPS.COM-T-1-18.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

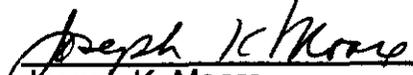
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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/STAMPS.COM-T2-18

a. Please confirm that Stamps.com currently advertises "\$20 free postage" under the "Simple Plan" and "\$50 free postage" under the "Power Plan" on its web site: <http://www.stamps.com/simple/pricing>. If not confirmed, please explain.

b. Please list all such marketing programs (e.g., website promotions, magazine advertising, TV commercials, etc.) Stamps.com 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 38 line 17 of your testimony you state that "a discount will increase the attractiveness of using IBIP..." However, as stated above, Stamps.com 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 Stamps.com.