

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 KUHR  
(USPS/STAMPS.COM-T-2-10-11)

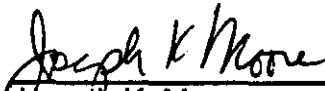
Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to Stamps.com witness Kuhr: USPS/STAMPS.COM-T-2-10-11.

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  
(202) 268-3078; Fax -5402  
June 16, 2000

**USPS/STAMPS.COM-T2-10** On page 7, lines 4-6, you state that Stamps.com, reported 187,000 licensed and active customers using its service at the end of the first quarter. You further state that the number of customers continues to grow each day.

- (a) Please confirm that the end of the first quarter for Stamps.com was March 31, 2000. If not confirmed, please explain.
- (b) How many of these 187,000 customers were businesses and how many were households?
- (c) How much daily IBIP mailpiece volume did these 187,000 customers generate? If possible, please provide the volumes separately for businesses and households.
- (d) Please provide the most recent estimate available for the number of Stamps.com customers, breaking those customers out by households and businesses.
- (e) How much daily IBIP mailpiece volume are the customers in part (d) above generating? If possible, please provide the volumes separately for businesses and households.

**USPS/STAMPS.COM-T2-11** On page 5 of your testimony, you state "[i]n essence the use of Stamps.com software ensures that USPS's automation standards are met on each mailpiece produced by our customers."

- (a) Is a Stamps.com customer able to apply postage to a mail piece that exceeds size, shape, and weight limitations for automation-compatible mail, for example, a letter weighing 4 ounces or a parcel?
- (b) Please confirm that the use of Stamps.com postage on a mail piece will guarantee its automation compatibility? Explain your response in detail.
- (c) Would you agree that a PC-postage mailpiece should be potentially eligible for the discount proposed by Stamps.com only if that piece is automation-compatible? Fully explain your response.

## 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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June 16, 2000