

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
PITNEY BOWES, INC. WITNESS HALDI
(USPS/PB-T2-17)

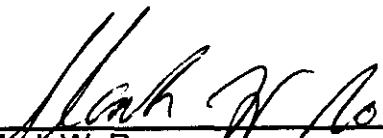
Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to Pitney Bowes, Inc. witness Haldi: USPS/PB-T2-17.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Mark W. Ro

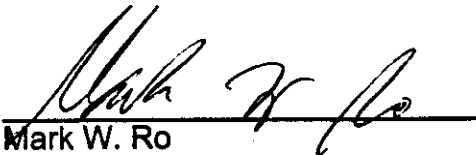
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Washington, D.C. 20260-1137
(202) 268-3231 Fax -5402
June 16, 2000

USPS/PB-T2-17. On page 23, lines 18-22 you cite witness Heisler's testimony (PB-T-3) that an estimated 4.954 billion mailpieces annually – composed of 3.518 billion from small businesses and 1.436 billion from households – will switch from stamps to postage meters or PC Postage if a one-cent discount is adopted.

- a. Please confirm that you have not incorporated witness Heisler's estimate of 2.6 billion small business mailpieces switching from stamps to PC Postage because it is not mutually exclusive from the estimate of 3.158 billion small business mailpieces switching from stamps to postage meters and therefore could lead to double-counting. If you cannot confirm, please explain.
- b. Please confirm that 342.8 million of the 4.954 billion will convert from stamps to postage meters or PC Postage without the inducement of a one-cent discount, and that therefore the volume response to a one-cent discount should be measured as 4.611 billion mailpieces annually. If you cannot confirm, please explain.
- c. If the correct volume response is 4.611 billion mailpieces annually, please confirm that the net revenue effect in section V.C. of your testimony would be calculated as -\$161.6 million. If you cannot confirm, please explain.

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.


Mark W. Ro

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