

Before the
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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Postal Rate and Fee Changes, 2000

POSTAL RATE COMMISSION
SECRETARY
Docket No. R2000-1

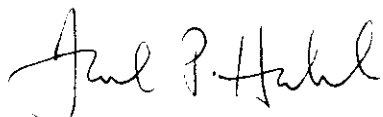
**STAMPS.COM'S PARTIAL OBJECTION TO USPS INTERROGATORY
TO WITNESS LAWTON (USPS/STAMPS.COM – T3 – 1)**

Stamps.com hereby partially objects to interrogatory USPS/Stamps.com – T3 – 1 to witness Leora Lawton to the extent that it would require Stamps.com to provide confidential and proprietary information concerning the demographic composition of its customers. The interrogatory asks Stamps.com to provide "all supporting data and documentation" concerning its customers' demographics.

Stamps.com has no objection to confirming that it has a substantial number of customers who qualify as households, home offices, small businesses (1 – 9 employees), and large businesses (10+ employees). Stamps.com, however, objects to providing a detailed demographic breakdown or any further detail concerning its customer base. First, a detailed breakdown of Stamps.com's customer base is irrelevant for determining the cost avoidance and proper discount to be provided for IBIP mail. Such information is also unlikely to lead to relevant data. Second, such data is considered confidential, and could cause competitive harm to Stamps.com if disclosed.

WHEREFORE, Stamps.com partially objects to USPS/Stamps.com – T3 – 1.

Respectfully submitted,

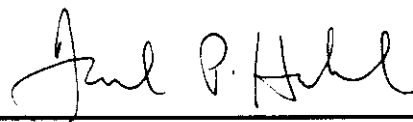


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Dated: June 19, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this 19 day of June 2000, served the foregoing document in accordance with the Commission's Rules of Practice.



David P. Hendel