

Before the
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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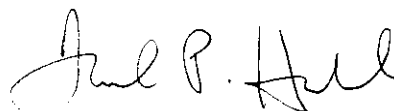
Postal Rate and Fee Changes, 2000

Docket No. R2000-1

**STAMPS.COM'S ANSWERS TO THE INTERROGATORIES OF
LEORA LAWTON (USPS/STAMPS.COM-T3-1- 3)**

Stamps.com hereby submits the answers of Leora E. Lawton to the interrogatories submitted by the U.S. Postal Service, USPS/Stamps.com - T3 - 1 - 3 dated June 8, 2000. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,



David P. Hendel
Wickwire Gavin, PC
8100 Boone Blvd., Suite 700
Vienna, VA 22182-2642
Tel.: (703) 790-8750

Dated: June 22, 2000

USPS/STAMPS.COM-T3-1 Did you conduct any research that quantified the demographics of Stamps.com customers? (e.g., number of businesses/SOHOs/ households, industry classifications for businesses, number of employees, etc.) ? If so, please list each demographic and provide all supporting data and documentation.

RESPONSE:

Yes. Survey results indicated that Stamps.com had a substantial amount of customers in the following categories: households, home office, small office (1-9 employees), and large office (10+ employees). Because the survey results could potentially affect or harm Stamps.com's competitive position, Counsel has objected to providing more detailed information.

USPS/STAMPS.COM-T3-2 Did you conduct any research that quantified the mail piece characteristics for the mail pieces to which postage has been applied using Stamps.com software? If so, please list each mail piece characteristic and provide all supporting data and documentation.

RESPONSE:

No such research was conducted.

USPS/STAMPS.COM-T3-3 On page 19 lines 6-7 of your testimony you state that "it is obvious that Stamps.com has completely changed how customers run their postal processes, and has the potential to significantly cut costs for the USPS while increasing patronage."

a. Please confirm that you did not conduct any cost studies as part of your testimony. If not confirmed, please explain.

b. Please confirm that you did not develop volume forecasts in the test year, or future years, for mail pieces processed using Stamps.com software. If not confirmed, please explain.

RESPONSE:

(a) Confirmed.

(b) Confirmed.

DECLARATION

I, Leora E. Lawton, declare under penalty of perjury that the answers to interrogatories USPS/Stamps.com – T3 – 1 – 3 of the U.S. Postal Service are true and correct, to the best of my knowledge, information, and belief.

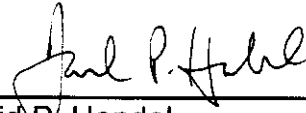
A handwritten signature in cursive script, reading "Leora E. Lawton", written over a horizontal line.

Leora E. Lawton

Dated: June 19 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this 22 day of June 2000, served the foregoing document in accordance with the Commission's Rules of Practice.

A handwritten signature in cursive script, appearing to read "David P. Hendel", is written over a horizontal line.

David P. Hendel