

Before the
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

**STAMPS.COM'S OBJECTION TO USPS INTERROGATORY
TO WITNESS HESELTON (USPS/STAMPS.COM – T1 – 18(b) – (c))**

Stamps.com hereby objects to interrogatories USPS/Stamps.com – T1 – 18(b) – (c) to witness Frank Heselton as irrelevant, unduly burdensome, and requiring the submission of confidential information.

Interrogatory USPS/STAMPS.COM-T2-18(b) asks for a list of all marketing programs, including website promotions, magazine advertising, TV commercials, and "etc." in which Stamps.com has offered customers free postage for trying its service. The interrogatory also asks for the dates, or date ranges, of such marketing programs, and the total postage discounts offered. The entirety of all of the marketing incentives that Stamps.com has offered first-time customers since commencing service to the current time cannot possibly be relevant to the discount being proposed in this proceeding. Neither could such information lead to relevant evidence.

The request is also unduly burdensome. Stamps.com engages in many different marketing programs in many media. Compiling this information would take a substantial expenditure of time and effort, with no possible benefit to the issues raised in this proceeding. Complying with the request would also require the production of a highly confidential list of Stamps.com's marketing programs. A competitor who viewed the list could make determinations concerning Stamps.com's marketing strategies and

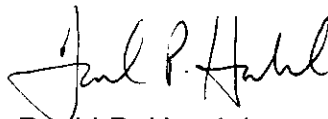
initiatives, and its successes or failures. This would substantially harm Stamps.com's competitive position and provide an unfair competitive advantage to its competitors.

Interrogatory USPS/STAMPS.COM-T2-18(c) asks Heselton to describe the extent to which Stamps.com's marketing programs have been successful in attracting new customers to Stamps.com. Any answer to this interrogatory (which would likely be a subjective answer) is not relevant to any aspect of this proceeding, nor could it lead to relevant evidence. The extent to which Stamps.com's marketing program has been effective has no relationship to the proper discount that IBI mail should receive.

As with the previous subpart, the request is also unduly burdensome. Stamps.com engages in many different marketing programs in many media. Compiling this information and making a determination as to its success would take a substantial expenditure of time and effort, with no possible benefit to the issues raised in this proceeding. Complying with the request would also require the production of a highly confidential list of Stamps.com's marketing programs. A competitor who viewed the list would gain insight into Stamps.com's marketing strategies and initiatives, and its successes and failures. This would substantially harm Stamps.com's competitive position and provide an unfair competitive advantage to its competitors.

WHEREFORE, Stamps.com objects to USPS/Stamps.com – T1 – 18(b) and (c).

Respectfully submitted,

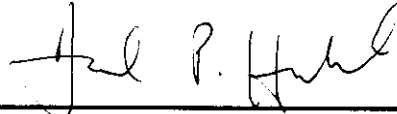


David P. Hendel
Wickwire Gavin, PC
8100 Boone Blvd., Suite 700
Vienna, VA 22182-2642
Tel.: (703) 790-8750

Dated: June 26, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this 26 day of June 2000, served the foregoing document in accordance with the Commission's Rules of Practice.

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

David P. Hendel