

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 INTERROGATORIES
TO WITNESS KUHR (USPS/STAMPS.COM – T2 – 10(b) through (e))**

Stamps.com hereby objects to interrogatories USPS/Stamps.com – T2 – 10(b) through (e) as irrelevant, unduly burdensome, already within the knowledge of the Postal Service, and requiring the submission of confidential information.

Interrogatories T2-10(b) and (d) ask for a breakdown on how many Stamps.com's customers are businesses and how many are households. The Postal Service already possesses this information, which it receives directly from IBIP users. The Postal Service acquires this information from its IBIP meter license application, which asks each applicant whether the meter is being acquired for consumer or business purposes. The Postal Service is thus the direct recipient of this data. Stamps.com does not believe this data is necessary or relevant to its proposal, but if the Postal Service does, it should have the burden of compiling it as it already possesses the data. It would be unduly burdensome to require Stamps.com to compile the information when USPS is the direct recipient of this same information.

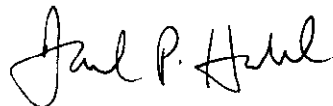
Moreover, this information is considered highly confidential. Any release of this information would have to be subject to a protective order. The Commission and participants should not be burdened unnecessarily with submitting and administering material submitted under a protective order.

Interrogatories T2-10-(c) and (e) ask for the amount of daily mailpiece volume generated by Stamps.com's customers, and ask for separate breakdowns for business and households. Once again, the Postal Service already possesses this information. Each Accounting Period, Stamps.com provides to the Postal Service an audit log showing print volume by customer. From this information, the Postal Service can readily determine daily mailpiece volume. If the Postal Service wishes to do so, it can trace this information back to the meter license application to determine print volume breakdowns for businesses and households.

Because the same information is already in the hands of the Postal Service, it would be unduly burdensome to require Stamps.com to perform this compilation for the Service. In addition, the number of Stamps.com users is irrelevant, as we are proposing a discount for *all* IBI open system users, not just Stamps.com IBI open system users. Further, this information is highly confidential, and could be released only under a protective order. The Commission and participants should not be burdened with submission and administration of protected material in these circumstances.

WHEREFORE, Stamps.com objects to USPS/Stamps.com – T2 – 10(b) – (e).

Respectfully submitted,

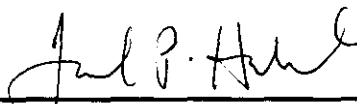


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Dated: June 26, 2000

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.



David P. Hendel