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Before the POSTAL RATE COMMISSION WASHINGTON, DC 20268-0001

Jun 26 2 49 PM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

STAMPS.COM'S ANSWER TO USPS INTERROGATORY DIRECTED TO FRANK HESELTON (USPS/STAMPS.COM-T1-18)

Stamps.com hereby submits the answers of Frank R. Heselton to the interrogatories submitted by the U.S. Postal Service, USPS/Stamps.com - T1 - 18, dated June 15, 2000. Each interrogatory is stated verbatim and is followed by the response. An objection has been filed to Interrogatory 18(b) and 18(c).

Respectfully submitted.

Qavid P. Hendel Wickwire Gavin, PC

8100 Boone Blvd., Suite 700

Vienna, VA 22182-2642

Tel.: (703) 790-8750

Dated: June 26, 2000

USPS/STAMPS.COM-T1-18 [Reference number corrected to "T1"]

- a. Please confirm that Stamps.corn currently advertises "\$20 free postage" under the "Simple Plan" and "\$50 free postage" under the "Power Plan" on its web site: http://www.stamps.com/simple/pricing. If not confirmed, please explain.
- b. Please list all such marketing programs (e.g., website promotions, magazine advertising, TV commercials, etc.) Stamps.corn has used to offer customers free postage or total postage discounts. Include the date(s) and/or date ranges that these programs have been presented to the public.
- c. On page 38 line 17 of your testimony you state that "a discount will increase the attractiveness of using IBIP..." However, as stated above, Stamps.corn currently does offer customers a discount in the form of free postage. Please describe the extent to which this free postage offer, or the other marketing programs described in your response to (b), have been successful in attracting new customers to Stamps.corn.

RESPONSE:

- (a) Confirmed, though such incentives are subject to change without notice.
- (b) Objection filed.
- (c) Objection filed.

DECLARATION

I, Frank R. Heselton, declare under penalty of perjury that the answers to interrogatory USPS/Stamps.com – T1 – 18 of the U.S. Postal Service are true and correct, to the best of my knowledge, information, and belief.

Frank R. Heselton

Dated: June 26, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this $2 $ day of	<u> </u>
the foregoing document in accordance with the C	ommission's Rules of Practice.
David P.	l P. Hul Hendel