BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF E-STAMP CORPORATION AND STAMPS.COM WITNESS RAY BOGGS TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE (USPS/E & S-T-1-1-8)

E-Stamp Corporation and Stamps.com hereby provide the responses of witness

Boggs to the following interrogatories of United States Postal Service: USPS/E & S-T-

1-1-3, filed on June 8, 2000, and served on June 14, 2000, and USPS/E & S-T-1-4-8,

filed on June 13, 2000, and served on June 14, 2000.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

Timothy J. May PATTON BOGGS LLP 2550 M Street, NW Washington, D.C. 20037-1350 Tel. 202/457-6050 Fax: 202/457-6315

Counsel for E-Stamp Corporation

Dated: June 27, 2000

RESPONSE OF E-STAMP CORPORATION AND STAMPS.COM WITNESS RAY BOGGS TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE

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USPS/E&S-T1-1 On page 17 lines 2-3 of your testimony you state "[s]mall businesses are interested in the idea of PC postage, with more than one PC owner in 10 very or somewhat interested in the concept." Does this not suggest an overwhelming majority of small business PC owners are neither "very" nor "somewhat" interested in the concept?

RESPONSE:

Yes, the majority of small businesses are neither "very" nor "somewhat"

interested in any form of PC postage

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USPS/E&S-T1-2 On page 17 lines 10-11 of your testimony you state "[p]ricing was not associated with any of the solutions; just the general interest levels in the different concepts were measured."

a. In your market research experience, have the specific prices associated with products had a direct influence on the level of interest in that product? If your response is affirmative to any degree, please explain why specific pricing information was not included in the research that supports your testimony.

b. Did your research gauge the interest level of small businesses and other PC postage users were a discounted rate to be offered? If not, why not?

RESPONSE:

a. Yes, in my experience price most definitely has an influence on interest in a

product. Pricing was not included as part of the survey research because of time

and cost constraints.

b. No assessment was made of interest in PC postage if a discounted postal rate

were to be offered. This was because of time and cost constraints.

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USPS/E&S-T1-3 On page 25 lines 19-20 of your testimony you state that small businesses "will be the primary market for PC postage." Did you conduct any market research as to what types of mailers currently use PC postage products? If so, please provide copies of all documents generated in connection with such research.

RESPONSE:

No research was conducted on what types of mailers currently use PC products.

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the Postal Service by hand and by First-Class Mail upon all participants in this proceeding requesting such service.

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Timothy J. May

Dated: June 27, 2000