

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

UNITED STATES POSTAL SERVICE
MOTION TO COMPEL STAMPS.COM
TO RESPOND TO INTERROGATORY USPS/STAMPS.COM-T1-2(C)
(June 28, 2000)

Pursuant to rules 26(d) and 27(d) of the Rules of Practice and Procedure, the United States Postal Service respectfully moves to compel Stamps.com to respond to interrogatory USPS/STAMPS.COM-T1-2(C).

The interrogatory in dispute seeks the production of Stamps.com customer demographic data used to formulate the testimony of Stamps.com witness Heselton (Stamps.com-T-1). In his June 26, 2000, response to interrogatory USPS/STAMPS.COM-T1-2(C), witness Heselton indicated that the question had been redirected to witness Lawton and alluded to an objection filed in response to USPS/STAMPS.COM-T3-1. The issues raised in USPS Motion to Compel Stamps.com to Respond to Interrogatory USPS/STAMPS.COM-T3-1 are applicable to the interrogatory in question (STAMPS.COM-T1-2(C)), and are incorporated by reference. The Postal Service considers the information requested relevant and material in assessing the validity of claims made by witness Heselton.

Therefore, the Presiding Officer should compel Stamps.com to respond to interrogatory USPS/STAMPS.COM-T1-2(C). If necessary, the Presiding Officer should consider conditional disclosure of the requested information upon the application of

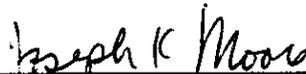
such protective conditions as are deemed appropriate to protect the proprietary,
commercial and competitive interests of Stamps.com from harm.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

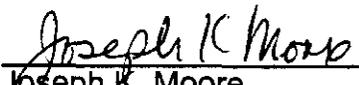


Joseph K. Moore

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June 23, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Joseph K. Moore

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June 23, 2000