

Before the
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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OFFICE OF THE SECRETARY

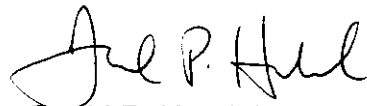
Postal Rate and Fee Changes, 2000

Docket No. R2000-1

**STAMPS.COM'S ANSWER TO ABA AND NAPM INTERROGATORIES
DIRECTED TO FRANK HESELTON (ABA&NAPM/STAMPS.COM-T1-1-3)**

Stamps.com hereby submits the answers of Frank R. Heselton to the interrogatories submitted by ABA and NAPM, ABA&NAPM/Stamps.com - T1 – 1 – 3, dated June 16, 2000. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,



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

Dated: June 30, 2000

ABA&NAPM/STAMPS.COM-T1-1

In your testimony you repeatedly observe that IBI mail is prepared to automation compatible standards. Do you not, therefore, agree that mail that has been automated via an MLOCR would have all of the cost avoidance features you attribute to IBI prepared mail? If you do not agree, please state each and every reason you have for disagreeing and identify specifically which cost avoidance features automated mail (mail that has had a CASS/MASS certified 11-digit delivery point barcode applied to it) would not have that IBI prepared mail has.

RESPONSE:

A piece of mail addressed with a CASS/MASS certified address and processed via an MLOCR would have an 11-digit delivery point barcode representation of a CASS/MASS certified address. This would permit the mailpiece to be run on a barcode reader just as an IBIP prepared and addressed mailpiece could be run. The difference is that the presence of an appropriate FIM on the IBIP prepared and addressed piece would indicate to an AFC that the piece contained a barcode, while the lack of a FIM on the piece prepared on an MLOCR would require USPS to identify the piece as pre-barcode by some other method.

ABA&NAPM/STAMPS.COM-T1-2

Do you agree that automated mail processed with FAST*forward* would have addresses that are as current and accurate and deliverable as IBI prepared mail. If you do not agree please state precisely why automated mail processed with FAST*forward* would not have as current and deliverable address as IBI prepared mail.

RESPONSE:

Agreed.

ABA&NAPM/STAMPS.COM-T1-3

Why do you assume on page 16 lines 20-22 that most of the deficiencies in the third line, the city/state/ZIP Code line, would "be detected at image lift" and would not require returning the piece to the sender?

RESPONSE:

As I indicate in my testimony on page 16, lines 19 to 22, my review of the specific deficiencies in the city/state/ZIP address line leads me to conclude that most would be detected at image lift and corrected early in mail processing. My review consisted of an examination of the detailed address deficiency results presented on page 15 of the Address Deficiency Study (ADS, USPS-LR-I-192/R2000-1). The ADS indicates that about 80 percent of the deficiencies in the city/state/ZIP line involve 5-digit ZIP codes that do not match street/city/state or are incomplete or missing, or incorrect sender-provided ZIP Plus 4 codes. These deficiencies can be remedied in mail processing through use of the city and state information on the mailpiece.

DECLARATION

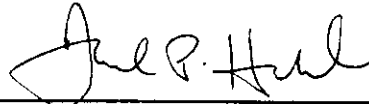
I, Frank R. Heselton, declare under penalty of perjury that the answers to interrogatory ABA&NAPM/Stamps.com – T1 – 3 of the U.S. Postal Service are true and correct, to the best of my knowledge, information, and belief.


Frank R. Heselton

Dated: June 30, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this 30 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