

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

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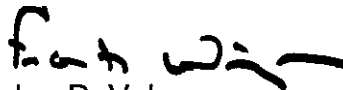
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INSTITUTIONAL RESPONSES OF PITNEY BOWES INC.
TO INTERROGATORIES
OF THE OFFICE OF CONSUMER ADVOCATE
(REFERRED FROM JUDITH MARTIN)
(OCA/PB-T1-1-5)

Pitney Bowes hereby provides responses to the above listed interrogatories of the Office of Consumer Advocate referred from Judith Martin. Each question is stated verbatim and is followed by the response.

Respectfully submitted,



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Dated: July 3, 2000

**RESPONSE OF PITNEY BOWES INC. TO INTERROGATORY
OF THE OFFICE OF CONSUMER ADVOCATE
REFERRED FROM JUDITH MARTIN**

OCA/PB-T1-1. Provide a breakdown of the number of Pitney Bowes current meter customers in the following (or similar) categories: household, home office, small office, small business, large business. Describe the parameters of each category (i.e., how many mailpieces, type of use, etc.).

Response:

Without waiving relevancy objections, the information is not available in the form or in a form similar to the categories and parameters specified.

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OCA/PB-T1-2. Provide Pitney Bowes' estimate of the number of active meter customers it expects to have by the end of the test period in this Docket No. R2000-1 (September 2001). Break down the estimate by the categories of customers given in response to OCA/PB-T1-1. Indicate specifically how many of the total number of projected customers are (a) households and (b) home offices?

Response:

Without waiving relevancy objections, the information is not available in the form or in a form similar to the categories and parameters specified.

**RESPONSE OF PITNEY BOWES INC. TO INTERROGATORY
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OCA/PB-T1-3. Currently, what is the average amount of postage purchased by a Pitney Bowes customer monthly? What is the average number of mailpieces to which a Pitney Bowes customer applies Pitney Bowes postage monthly?

Response:

Pitney Bowes does not, in the ordinary course of business, track the average amount of postage purchased by a Pitney Bowes customer monthly. Without waiving relevancy objections, according to the available data, the amount of postage purchased at any one reset varies from \$20.26 per reset to \$6,569 depending upon the model type. Please note that these figures are per reset and that resets can occur more or less frequently than monthly. The average number of pieces to which a Pitney Bowes customer may apply Pitney Bowes postage is not known to Pitney Bowes on a monthly or any other basis. However, information as to the extent of usage is contained in PB-LR-4.

**RESPONSE OF PITNEY BOWES INC. TO INTERROGATORY
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OCA/PB-T1-4. Provide, both currently and as projected for the end of the test period (September 2001), the number of active Pitney Bowes customers that apply postage to (a) 25 or fewer mailpieces monthly and (b) 100 or fewer mailpieces monthly.

Response:

Without waiving relevancy objections, the information is not available in the form or in a form similar to the categories and parameters specified. See PB-LR-4.

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OCA/PB-T1-5. For customers applying First-Class postage to one ounce letter mailpieces through Pitney Bowes, please state the costs (over and above the cost of postage) to mail (a) 20 letters and (b) 80 letters each month. If there are choices of plans at different prices, indicate the most economical for the customer. Provide copies of rate plans.

Response:

Without waiving relevancy objections, information as to the "costs" (over and above the cost of postage) to mail varying number of "letters" is not available. While Pitney Bowes offers a number of rate plans, none are based on the number of letters that a customer may mail. Information concerning the effects of meter ownership on the usage of First-Class and other Postal Service products is provided in PB-LR-4 on file with the Commission.

CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.


N. Frank Wiggins