### Before the POSTAL RATE COMMISSION WASHINGTON, DC 20268-0001

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POSTAL NATE CONTAINSING OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

# STAMPS.COM'S ANSWERS TO THE INTERROGATORIES OF THOMAS KUHR (USPS/STAMPS.COM-T2-10- 11)

Stamps.com hereby submits the answers of Thomas C. Kuhr to the

interrogatories submitted by the U.S. Postal Service, USPS/Stamps.com - T2 - 10 - 11

dated June 16, 2000. Each interrogatory is stated verbatim and is followed by the

response. Pursuant to Commission Rule 26(b), a signature page will be filed with the

Commission within 10 days.

Respectfully submitted,

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

Dated: July 3, 2000

## USPS/STAMPS.COM-T2-10

USPS/STAMPSCOM-T2-10 On page 7, lines 4-6, you state that Stamps.com, reported 187,000 licensed and active customers using its service at the end of the first quarter. You further state that the number of customers continues to grow each day.

(a) Please confirm that the end of the first quarter for Stamps.com was March 31,2000. If not confirmed, please explain.

(b) How many of these 187,000 customers were businesses and how many were households?

(c) How much daily IBIP mailpiece volume did these 187,000 customers generate? If possible, please provide the volumes separately for businesses and households.

(d) Please provide the most recent estimate available for the number of Stamps.com customers, breaking those customers out by households and businesses.

(e) How much daily IBIP mailpiece volume are the customers in part (d) above generating? If possible, please provide the volumes separately for businesses and households.

## **Response:**

- (a) Confirmed.
- (b) This question was objected to by counsel. Stamps.com has a substantial number of users in both categories.
- (c) This question was objected to by counsel.
- (d) This question was objected to by counsel. We can say that, as of our last press release, dated June 20, 2000, we had "more than 200,000 customers."
- (e) This question was objected to by counsel.

#### USPS/STAMPS.COM-T2-11

On page 5 of your testimony, you state "[i]n essence the use of Stamps.com software ensures that USPS's automation standards are met on each mailpiece produced by our customers."

(a) Is a Stamps.com customer able to apply postage to a mail piece that exceeds size, shape, and weight limitations for automation-compatible mail, for example, a letter weighing 4 ounces or a parcel?

(b) Please confirm that the use of Stamps.com postage on a mail piece will guarantee its automation compatibility? Explain your response in detail.

(c) Would you agree that a PC-postage mailpiece should be potentially eligible for the discount proposed by Stamps.com only if that piece is automation-compatible? Fully explain your response.

#### **RESPONSE:**

(a) If labels are used, it is possible that postage may be misapplied to a package or envelope that is different in character than specified in the software by the customer. If envelopes are used, this is not possible, as the size of the envelope is enforced by the software and the printer.

(b) Confirmed. Each IBIP mailpiece contains the two elements required for automation: an orienting mark (FIM for envelopes or fluorescent stripe for labels), and a POSTNET barcode. Both elements are printed in the required manner, resolution and layout as specified in USPS Publication 25, <u>Designing Letter Mail</u>.

(c) No, because even if not automation-compatible, the address of a PC Postage mailpiece will be cleansed, resulting in cost savings to USPS from reduced return-to-sender mail.

### DECLARATION

I, Thomas C. Kuhr, declare under penalty of perjury that the answers to interrogatories USPS/Stamps.com – T2 - 10 - 11 of the U.S. Postal Service are true and correct, to the best of my knowledge, information, and belief.

Thomas C. Kuhr

Dated: \_\_\_\_\_

# **CERTIFICATE OF SERVICE**

I hereby certify that I have this 3 day of 3/2 day of 3/2 2000, served the

foregoing document in accordance with the Commission's Rules of Practice.

Jarl P. Hendel