

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

POSTAL RATE  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

UNITED STATES POSTAL SERVICE FOLLOW-UP  
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO  
STAMPS.COM WITNESS KUHR  
(USPS/STAMPS.COM-T-2-13-14)

Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatories and request for production of documents to Stamps.com witness Kuhr: USPS/STAMPS.COM-T-2-13-14.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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Joseph K. Moore

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July 10, 2000

**USPS/STAMPS.COM-T2-13** Please refer to your response to USPS/STAMPS.COM-T2-11(B). You confirmed that use of Stamps.com postage guaranteed automation compatibility. However, in USPS/STAMPS.COM-T1-26, witness Heselton acknowledged that use of PC-postage made automation compatibility "highly likely" but not guaranteed. Please reconcile the two statements.

**USPS/STAMPS.COM-T2-14** Please refer to your response to USPS/STAMPS.COM-T2-11(C). Are you suggesting that a PC-postage mailpiece that does not entirely meet automation-compatibility standards should be entitled to the full 4 discount proposed by Stamps.com?

## 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.

  
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Joseph K. Moore

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