

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
FOLLOW-UP INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS TO
E.STAMP & STAMPS.COM WITNESS BOGGS
(USPS/E & S-T-1-22-23)

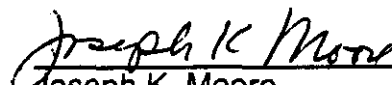
Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following follow-up interrogatories and requests for production of documents to E.Stamp and Stamps.com witness Boggs: USPS/E & S-T-1-22-23.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Joseph K. Moore

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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Washington, D.C. 20260-1137
(202) 268-3078; Fax -5402
July 11, 2000

USPS/E&S-T1-22 Please refer to your response to USPS/E&S-T1-10, where you state that the "Work-at-Home" survey was used in a limited capacity in your testimony. Please list, describe and provide the underlying data used to develop home office estimates in your testimony.

USPS/E&S-T1-23 Please refer to your response to USPS/E&S-T1-15.

(a) Please list by name, title, academic and professional experience/accomplishment each person whose "judgment" was used to formulate the key assumptions in Tables 2-10 of your testimony.

(b) In reference to the "past history" used to formulate key assumptions in Table 2-10 of your testimony, provide the relevant period.

(c) Describe in detail your understanding of the term "IDC market definition."