

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

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POSTAL RATE COMMISSION
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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

UNITED STATES POSTAL SERVICE
MOTION TO COMPEL E-STAMP AND STAMPS.COM
TO RESPOND TO INFORMATION REQUEST
(July 19, 2000)

Pursuant to rule 30(g) of the Rules of Practice and Procedure and as directed by Presiding Officer (*see* Tr. 29/13882), the United States Postal Service respectfully moves to compel E-Stamp and Stamps.com to provide data that would permit the comparison of year 2000 forecast of PC-postage usage with actual year 2000 data.

On pages 11-36 of his testimony, E-Stamp & Stamps.com witness Boggs (E&S-T-1; Tr. 29/13824-49) forecasts year 2000 and future PC-postage use. In interrogatories USPS/E&S-T1 through T3, the Postal Service asked witness Boggs a series of questions seeking an explanation of his forecasts about PC postage use. In his responses to interrogatories T1-1 and T1-2, witness Boggs conceded limitations in his survey results and methodology. (*See* Tr. 29/13862). In interrogatory T1-3, witness Boggs was asked if he had conducted any market research as to what types of mailers currently use PC postage. He responded by indicating that he had not. (*Id.* at 13862-63).

The Postal Service is interested in comparing witness Boggs' forecasts of future use of PC postage to E-Stamp's and Stamps.com's available data concerning current use, in order to come to a judgment about the reasonableness of the forecasts. Witness Boggs has indicated that he conducted no such comparison. Following-up on that admission during cross-examination, the Postal Service asked witness Boggs

whether any periodically prepared internal assessments of year 2000 small business/home office spending on PC-postage were available. (Tr. 29/13880). He indicated that he did not know and that such information would have to be obtained from E-Stamp and Stamps.com. (*Id.* at 13881). The information requested is data which, presumably, E-Stamp and Stamps.com would collect in the normal course of business, and is not in the possession of the Postal Service.

E-Stamp and Stamps.com has presented, through witness Boggs, information in the form of forecasts for PC-postage usage. His testimony projects growth of PC-postage in certain industry segments. The Postal Service considers that it should be permitted to test the validity of those forecasts by comparing them to data on current use.

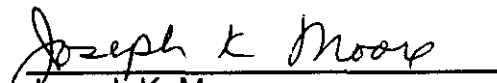
For these reasons, the Presiding Officer should compel E-Stamp and Stamps.com to provide the requested information. If necessary, the Presiding Officer should consider conditional disclosure of the requested information upon the application of such protective conditions as are deemed appropriate to protect any proprietary, commercial and competitive interests of E-Stamp and Stamps.com from harm.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

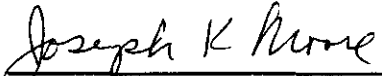


Joseph K. Moore

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July 19, 2000

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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July 19, 2000