

Before the  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

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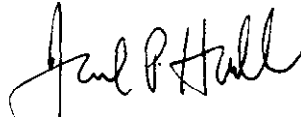
Postal Rate and Fee Changes, 2000

Docket No. R2000-1

**STAMPS.COM'S ANSWERS TO USPS INTERROGATORY DIRECTED  
TO THOMAS KUHR (USPS/STAMPS.COM-T2-13 - 14)**

Stamps.com hereby submits the answers of Thomas C. Kuhr to the interrogatory submitted by the Postal Service, USPS/Stamps.com - T2 - 13 - 14 , dated July 10, 2000. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,



David P. Hendel  
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Dated: July 24, 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-TI-26, witness Heselton acknowledged that use of PC-postage made automation compatibility "highly likely" but not guaranteed. Please reconcile the two statements.

**RESPONSE:**

Both my answer and Heselton's answer are essentially the same: Stamps.com produces only automation-compatible addresses. The difference lies in how we understood the question. Heselton's answer included the possibility suggested earlier in the interrogatory that the customer would overstuff an envelope to the extent that it was no longer automation compatible. In such a situation, while the address would be automation compatible, the mailpiece might not be. Thus, such a mailpiece could not be "guaranteed" to be automation compatible. My answer was limited to the address that Stamps.com produces on the mailpiece itself. Such addresses are "guaranteed" to be automation compatible, because the software does not permit the customer to produce an address that is not automation compatible.

**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?

**RESPONSE:**

No. But the possibility that a few pieces might turn out not to be automation compatible because of the scenario suggested in the interrogatory should not affect the overall discount proposal. I understand that automation discounts are available to other categories of mail even though a few pieces might turn out not to be automation compatible. The effect of the theoretical possibilities suggested by the Postal Service will be de minimus on the overall discount proposal.

**DECLARATION**

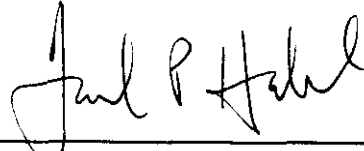
I, Thomas C. Kuhr, declare under penalty of perjury that the answers to USPS interrogatory USPS/Stamps.com – T2 – 13 - 14 are true and correct, to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
Thomas C. Kuhr

Dated: 7/10/00

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 24 day of July 2000, served the foregoing document in accordance with the Commission's Rules of Practice.

A handwritten signature in cursive script, reading "David P. Hendel". The signature is written in black ink and is positioned above a horizontal line.

David P. Hendel