

Before the
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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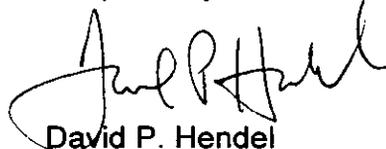
Postal Rate and Fee Changes, 2000

Docket No. R2000-1

**STAMPS.COM'S ANSWERS TO USPS INTERROGATORIES
DIRECTED TO LEORA LAWTON (USPS/STAMPS.COM-T3- 6- 8)**

Stamps.com hereby submits the answers of Leora E. Lawton to USPS interrogatories USPS/Stamps.com – T3 – 6 – 8, submitted by filings dated July 6, 2000 and July 10, 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,



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Dated: July 28, 2000

USPS/STAMPS.COM-T3-6.

Please refer to your response to USPS/STAMPS.COM-T-3-4. Please list, describe and provide the entire survey and associated responses, including the supporting data, with regards to the information provided in Stamps.com-LR-2.

RESPONSE:

The entire survey was provided in Stamps.com-LR-2, as well as the supporting data for the answers to each question relied upon in my testimony.

The responses to the other survey questions, which were not provided in Stamps.com-LR-2, are being provided as follows:

Library Reference Stamps.com-LR-3 was previously provided, and it contains the supporting data for the survey answers to questions concerning the use of handwritten mail and labels. This data was not considered confidential.

Library Reference Stamps.com-LR-4 will be provided under protective conditions, and will contain the supporting data for the survey answers to questions concerning refund requests, customer tenure, and customer demographics. This data is considered confidential.

USPS/STAMPS.COM-T3-7.

Please refer to your response to USPS/STAMPS.com-T-3-4.

- a. Please confirm that for survey questions 6(b) and 7(b), which refers to 9-digit zip codes, the questions should read "...[if greater than 0, then goto (c)]." If not confirmed, please explain.
- b. If confirmed what impact did the errors noted in (a) have on the results of your survey.

RESPONSE:

- a. It should not read 'if greater than 0, then goto (c)', because then those who had used a 9-digit ZIP Code would have skipped over the specific questions relating to use of the 9-digit ZIP Code. Perhaps what would have made more sense was 'go to (e)', assuming that anyone who had not used a 9-digit ZIP Code would have used neither the POSTNET code or the FIM code.
- b. There were 545 customers who reported no use of 9-digit zip code, and of those 69 reported some use of the POSTNET barcode. Again, as with the other instances of error, this source of respondent error only underreports the impact of Stamps.com on Postal Service use. There were 50 respondents who said they used a FIM code when they did not use a 9-digit zip code.

USPS/STAMPS.COM-T3-8.

Please refer to your response to USPS/STAMPS.COM-T-3-4. Questions 6(1) and 7(a) ask customers the percentage of pre-IBIP mailpieces that were printed, typed, and handwritten.

- a. Confirm that not all answers reflected 100 percent mail volume.
- b. Confirm that no adjustment was done to reflect the higher mail volume of businesses.
- c. If (a) and/or (b) are confirmed, explain what impact the errors had on the results of your survey.

RESPONSE:

- a. The respondents were asked about the proportion of mail they sent prior to use of Stamps.com and their answers tallied to 100%, except in cases where there was No Response.
- b. Confirmed.
- c. There were no errors in either (a) or (b). The former has already been explained. In the case of the latter, it is confirmed that that the analysis did not include adjustments for the proportions to reflect differential use among business compared to home use.

DECLARATION

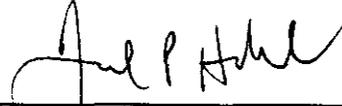
I, Leora E. Lawton, declare under penalty of perjury that the answers to interrogatories USPS/Stamps.com – T3 – 6 – 8 of the U.S. Postal Service are true and correct, to the best of my knowledge, information, and belief.

Leora E. Lawton

Dated: _____

CERTIFICATE OF SERVICE

I hereby certify that I have this 28 day of July 2000, served the foregoing document in accordance with the Commission's Rules of Practice.



David P. Hendel