

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

Complaint on Electronic Postmark®

Docket No. C2004-2

INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE  
TO DIGISTAMP WITNESS RICK BORGERS  
(USPS/DS-T1-1 - 10)

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby directs the following interrogatories to DigiStamp witness Rick Borgers: USPS/DS-T1-1 through USPS/DS-T1- 10.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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May 25, 2006

**USPS/DS-T1-1.** On unnumbered line 3 on page 1 of your testimony, you state that in 1998 you decided that you wanted to be on the cutting edge of creating new technology.

a. At that time were you aware of any other companies or entities that were offering digital time stamp or other similar services? Please explain fully, and identify any such companies or entities.

b. Were you aware of any patents for these types of digital time stamp or other similar services? Please explain fully.

**USPS/DS-T1-2.** Are you aware of any patents filed by the Postal Service relating to digital time-stamp or electronic authentication services? Please explain fully.

**USPS/DS-T1-3.** Did you apply for any patents for the “e-TimeStamp” service or product you mention on unnumbered line 2 of page 2 of your testimony? If so, were any patents awarded for this service or product? Whether or not the patent was awarded, please briefly describe any service or products for which you sought a patent.

**USPS/DS-T1-4.** Did you apply for any trademarks for the “e-TimeStamp” service or product you mention on unnumbered line 2 of page 2 of your testimony? If so, were any trademarks registered for this service or product? Whether or not the trademark was awarded, please briefly describe any service or products for which you sought a trademark.

**USPS/DS-T1-5.** On unnumbered line 7 of page 2 of your testimony, you state that: “In 2004, the USPS began offering the same service, calling it the ‘USPS Electronic Postmark Service.’” Please answer the following questions concerning this statement:

- a. When did you first learn of the “USPS Electronic Postmark Service?”
- b. What information did you receive about the service, and what was the source of the information?
- c. Were you aware of any previous use of the term “USPS Electronic Postmark Service”, or any similar name for a time and date stamp service offered by the Postal Service? Please explain fully.

**USPS/DS-T1-6.** Do you have any knowledge of the following Postal Service products:

- a. NetPost.Certified
- b. PostECS

If so, please explain your understanding of those products, including the timeframe in which they were offered.

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**USPS/DS-T1-7.** On unnumbered line 22 of page 7 of your testimony, you claim that the Postal Service has “lobbied” State legislators. Please provide details of all such alleged lobbying, including a description of the activities that you consider to constitute lobbying.

**USPS/DS-T1-8.** On unnumbered line 15 of page 8 of your testimony, you state that the USPS EPM is “almost always used in connection with a communication.” Are you

aware of any applications for the USPS EPM which do not involve a communication?

Please identify them.

**USPS/DS-T1-9.** On unnumbered line 15 of page 8 of your testimony, you state that the USPS EPM is “almost always used in connection with a communication.” What was the total volume of transactions using a Digistamp time date stamp? What was the percentage of those transactions that involved a “communication.” In your answer, please define the term “communication.”

**USPS/DS-T1-10.** On unnumbered line 10 of page 12 of your testimony, you state that the Postal Service was not a contributor to the work of the Internet Engineering Task Force (IETF) in the late 1990s. Are you aware of any efforts by the Postal Service to support the development of public policy for authentication of electronic communications during this period? If so, please identify such efforts, and any public documents to which the Postal Service contributed.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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