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

Complaint on Electronic Postmark®)

Docket No. C2004-2

REPLY BRIEF OF DIGISTAMP
(October 20, 2006)

Respectfully submitted,

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Introduction

On March 3, 2006, the Commission issued Order No. 1455, denying (in part) the Motion to Dismiss, and noticing the institution of a proceeding to address the matters raised in the complaint. DigiStamp's reply brief will be based primarily from Page 18 of Order 1455 where the scope of the proceedings is set:

In Docket No. RM2004-1, the Commission adopted a definition of the term postal service. That definition became effective February 16, 2006. In light of this and in summary fashion, the task of the parties in this proceeding is to develop a record demonstrating that, by the nature of the service provided, electronic postmark falls within (or outside) that meaning.

Therefore, the first 20 pages of the Postal Service Initial Brief seem very much out-of-scope for this Docket and DigiStamp has few comments on these pages. DigiStamp has provided extensive details where it is vital to the record of this proceeding to correct grossly erroneous, misleading statements made by the Postal Service in its initial brief about how the USPS EPM works.

In general, at this point in the process:

1. DigiStamp's reaffirms that its Initial Brief stands as-is. In this document on page 13, a section of that Initial Brief is included so that it could be annotated with citations.
2. DigiStamp agrees with and relies upon the arguments presented by the Office of the Consumer Advocate (OCA) in its Initial Brief.

Refute the misleading statements made by the Postal Service in their initial brief section “The USPS EPM is not a communication service”

In the complaint of DigiStamp against the Electronic Postmark, Docket 2004-2, the Commission has stated plainly in Order 1455 , “the task of the parties in this proceeding is to develop a record demonstrating that, by the nature of the service provided, electronic postmark falls within (or outside) that meaning”.

Extensive sworn filings and a formal hearing have been held in pursuit of the charge to clarify “the nature of the USPS EPM”¹. Yet in its Initial Brief, the Postal Service has introduced supposed statements of fact which are not in evidence, which are erroneous and misleading, while also mischaracterizing the DigiStamp position by making plainly false statements. The result is to hide, rather than clarify, the nature of the USPS EPM.

In particular, the Postal Service claims falsely (pp. 26-27) that DigiStamp focuses much of its attention on minor and ancillary uses of the USPS EPM within Microsoft products, including Microsoft Outlook.

Neither DigiStamp nor the Postal Service have referred to Microsoft Outlook in any testimony; because, as the details below demonstrate, Microsoft Outlook² is not part of the USPS EPM document delivery service.

Further, the Postal Service claims that the *USPS EPM® Extension for Microsoft® Office* is a Microsoft product; this is not only false, but prior testimony has

¹ In addition, DigiStamp’s surrebuttal testimony (DIGISTAMP-SRT-1) was comprehensive in providing evidence about this subject area. This evidence went unchallenged by the Postal Service. The Postal Service has failed to use this process and their opportunities to add clarity.

² Microsoft Outlook is an email program that is used by thousands and has become part of common knowledge for the public. It is a safe statement that it is common knowledge that Outlook sends and receives email.

established that the *USPS EPM® Extension for Microsoft® Office* is provided by and licensed by the Postal Service³, and only by the Postal Service.

Finally, the use and function of the *USPS EPM® Extension for Microsoft® Office* simply does not in any way depend upon or use Microsoft Outlook as the Postal Service's Initial Brief claims.

DigiStamp needs to describe facts showing the falsehood of the Postal Service's description of the USPS EPM on pages 26-27 of its brief in order to serve the charge of Order 1455: that is, to clarify the nature of the USPS EPM.

True facts are:

- (a) the software "Microsoft Outlook" has never been mentioned in written testimony or in oral cross examination as a required component of the USPS EPM product,
- (b) the software *USPS EPM® Extension for Microsoft® Office* is a specialized product distributed and licensed by the USPS and not by Microsoft,
- (c) the use of *USPS EPM® Extension for Microsoft® Office* does not depend upon Microsoft Outlook or its "return receipt" feature in any way,
- (d) it is therefore also not true that Digistamp has focused any attention at all on the use of the USPS EPM within Microsoft Outlook.

The purpose of the detailed response brief is to develop for the record an accurate appraisal of the nature of the USPS EPM in the face of the mischaracterizations offered by the Postal Service. These details are provided in a manner that allows other parties to examine the process and verify the facts.

³ Tr. 1/174, lns 20-22

Details of the problem

On the subject of “the nature of the EPM service”, beginning on page 26 of the Postal Service’s Initial Brief:

The complainant has focused much of his attention on one particular application of the USPS EPM, its incorporation into a Microsoft Extension for Word. Microsoft Word is linked with Microsoft Outlook, and Microsoft Outlook can provide a return receipt function, if selected by the user. As Witness Foti explained, in this Microsoft application, use of the return receipt function is the purpose of the Microsoft application, whatever its strengths or weaknesses, but that is not the purpose of the USPS EPM. Tr. 1/190, Ins 14-16. The Microsoft Word plug-in enables a message transfer as long as the customer also has an internet service provider. The USPS EPM does not engage in that transfer. Tr. 1/194, Ins 5-7. Within the Microsoft Word extension is an application which uses as a component the USPS EPM. Tr. at 1/199, Ins 12-14. In addition, use of this particular application feature is minimal. Messaging applications, including the return receipt feature within Microsoft Outlook, are less than one percent of all USPS EPM transactions.

A reader is led to believe that Outlook was being used to send emails and that Outlook was going to provide a delivery receipt. This is simply and factually incorrect, as a line-by-line analysis proves:

“The complainant has focused much of his attention on one particular application of the USPS EPM, its incorporation into a Microsoft Extension for Word.”

In fact, *USPS EPM® Extension for Microsoft® Office*⁴ is not a Microsoft product. The software is downloaded by the consumer from the Postal Service web site (exclusively), and the software installation package is digitally signed **only** by the Postal Service. When the customer installs the software, they agree to a license for the software that is an agreement between the customer and the Postal Service – no other parties.⁵

⁴ This name is clearly stated on the USPS web site and has been marketed as such for several years.

⁵ Tr 1/173 lines 13 and continuing to the next page line 12 showing that the Postal Services publishes this software, not Microsoft. And, Tr 1/175 lines 1-6. And, Tr 1/176 lines 23 to next page line 2. And, when the customer installs the software they agree to a license for the software that is an agreement between the customer and the Postal Service – no other parties Tr 1/174 line 14-22. The facts were further clarified in

“Microsoft Word is linked with Microsoft Outlook, and Microsoft Outlook can provide a return receipt function, if selected by the user.”

While this statement is true *as a description of Microsoft Office*, it has absolutely ***nothing*** to do with *the USPS EPM*.

The USPS EPM service works on your computer even if you do not have Outlook installed.⁶ This was tested on both the document sender’s computer and the document receiver’s computer - Outlook is not installed, not available for use.

The following screen prints are annotated where they were already presented in evidence. The software called *USPS EPM® Extension for Microsoft® Office* provides each of these functions.

testimony DIGISTAMP-SRT-1 page 3 lines 18-20, page 5 lines 7-10, page 11 lines 5-6, and page 12 lines 1-2

⁶ As with all of the software screens shown here and test data provided in Surrebuttal testimony, all of these tests can be done by anyone. I encourage people to try these tests on their own – it is not difficult and quickly clarifies the facts. Ultimately, this may be the best way for the reader to prove for themselves the issues at-hand.

Document sender selects to have a delivery receipt returned to them. The USPS EPM software displays this window (Tr. 1/176 Ins 8 continued to next page In 6, and Tr. 1/260 and DIGISTAMP-SRT-1 page 3 In 22 and page 11 In 7):

Postmark [X]

Postmark the Document

You are ready to sign this document. Upon clicking the Sign button below, this document will be electronically postmarked by the U.S. Postal Service. Note that your EPM account will be charged for an EPM transaction if you choose to Sign.

You hereby sign this document with the following digital identity:

Name: Rick Borgers

Issued By: GeoTrust True Credentials CA 2

[Change Signing Certificate]

Do you want this document electronically delivered with a return receipt?

[Sign] [Cancel] [Help]

Document sender enters the addresses and hits OK. The USPS EPM software displays this window (Tr. 1/177 In 8 continuing to page 178 In 19):

Request Return Receipt

Request E-mail Return Receipt
Please describe your document, and specify its intended recipients below. You will receive an email notification when your document has been sent, and another notification when each recipient acknowledges receipt of the document. The notices will include the times and dates of these events.
You may send a file no larger than 2 MB, and you may specify no more than 5 recipients.

Sender Information
Sender: please provide the email address for the recipient of this document, and the email address at which you would like to receive a receipt. Also, please provide the email addresses for the recipients of this document.

Your Email Address

Description of Document

Recipient Information

Recipient name

Recipient email address

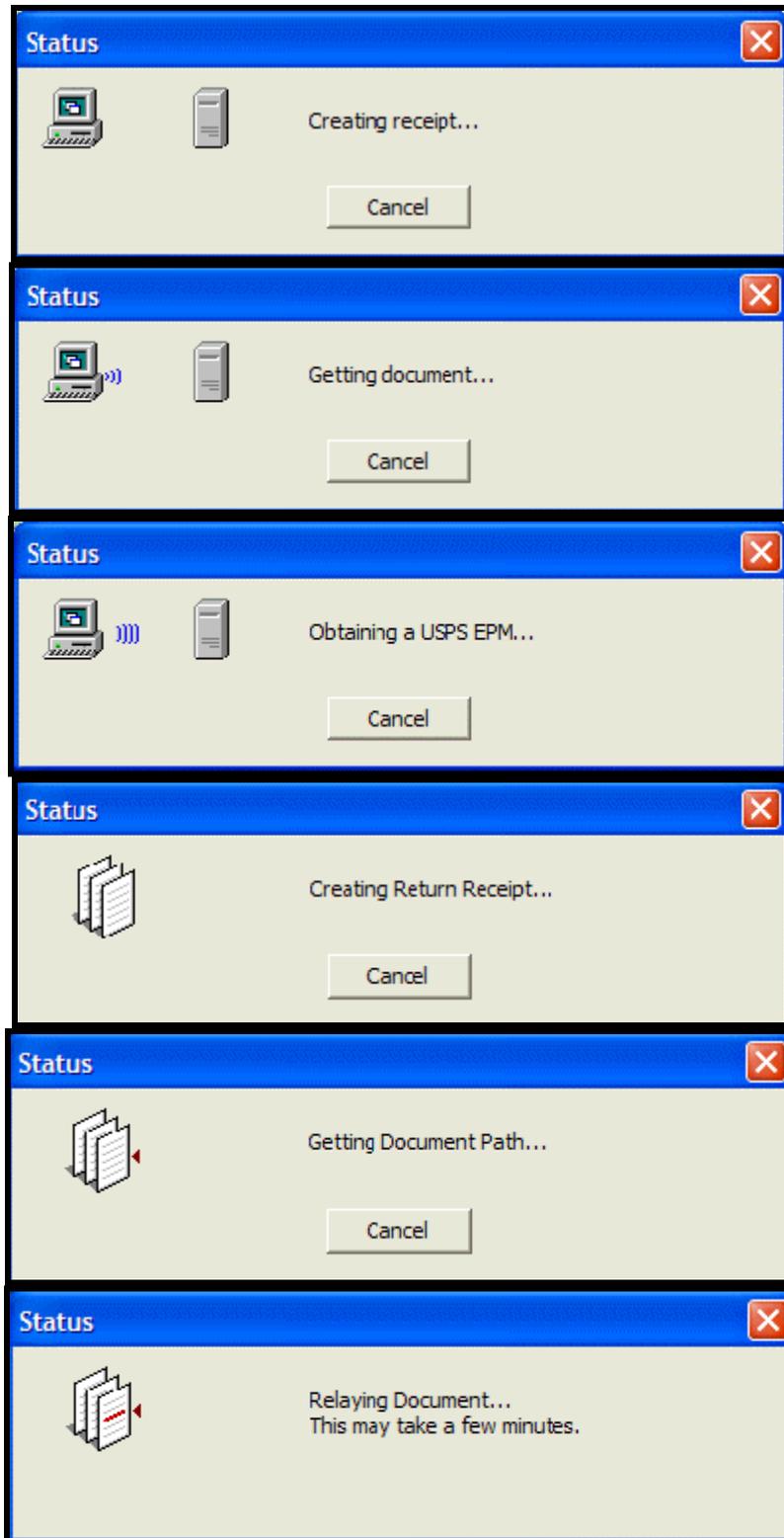
Add

List of Recipients
Shelley Dreifuss (PRC OCA) shelley.dreifuss@prc.gov
chris.casady@digistamp.com chris.casady@digistamp.com

UNITED STATES POSTAL SERVICE
Electronic Postmark Service

OK Cancel

The OK button provides the “send” function. When pressed, **the USPS EPM software** displays a series of screens (Tr 1/261 and Tr. 1/178 In 20 continuing to page 179 In 6)



As we have already established in sworn testimony, the document travels to the Postal Service data center, the Postal Service creates emails and sends them to

the designated recipients (Tr. 1/179 Ins 15-17 and Tr. 1/262-263 and DIGISTAMP-SRT-1/11 Ins 4-5 and DIGISTAMP-SRT-1/4 Ins 3-5 and DIGISTAMP-SRT-1/13 Ins 6-7 and DIGISTAMP-SRT-1/14 Ins 34-36).

The document **receiver** can use any software to access their email inbox. In the case of this particular test, DigiStamp used a Web browser to access an email account provided by Google (called gmail); this is the only software used.⁷ The email is from the Postal Service and tells the receiver they must install the USPS EPM software before viewing the document (Tr. 1/185 Ins 3-12 and Tr. 1/188 Ins 16-25). After reading this email from the Postal Service and saving the attached document to the computer, the receiver is presented a window to signify their acceptance of the document. Remember, again, in this test the computer being used does not have the Microsoft Outlook software installed. The USPS EPM software displays this window "Acknowledgement of Receipt":

Acknowledgement of Receipt

Acknowledgement of Receipt
You may click "Accept" below to view the document and acknowledge its receipt through an email that will be sent to the sender.
If you do not wish to accept this document, click "Return to Sender". be advised, however, that you will not be able to view this document now or in the future.
If you click "Cancel," you will have the opportunity at a later time to acknowledge receipt and view the attached document.

Description Provided by Sender
The following notes were provided by the sender of this document:

Sender: rick borgers
Description: test

Please type (or copy & paste) the tracking number, found at the bottom of the attached email, to proceed.

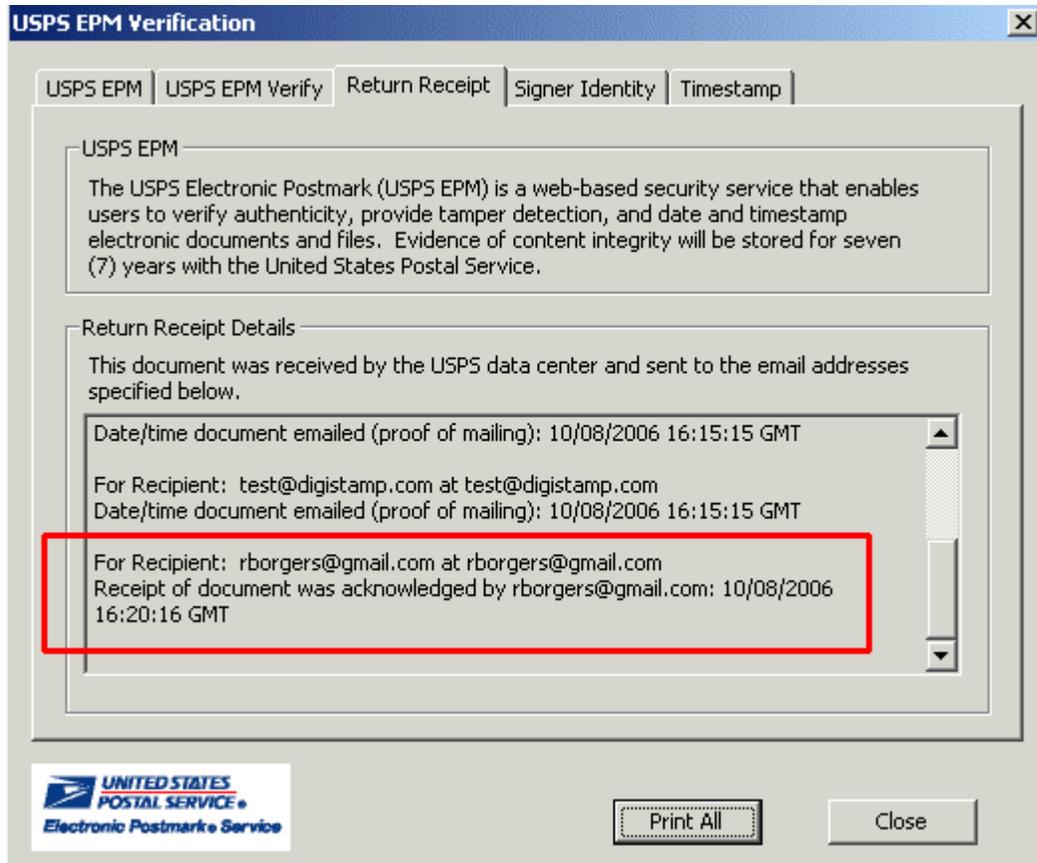
Tracking Number:

By clicking "Accept" below, I acknowledge receipt of this document.

Accept Return to Sender Cancel

⁷ While it is true that you could use Outlook for this function of retrieving your email, there are no unique qualities of Outlook required for use with this USPS EPM document delivery service.

Focusing back on the **sender's** computer, a window is presented **by the USPS EPM software** to verify the receipt of the document (Tr. 1/189 Ins 18-24 and DIGISTAMP-SRT-1/14 Ins 38 continued to next page 2).



Continuing with the line-by-line refutation of the Postal Service statement, the third sentence of that statement says,

“As Witness Foti explained, in this Microsoft application, use of the return receipt function is the purpose of the Microsoft application, whatever its strengths or weaknesses, but that is not the purpose of the USPS EPM. Tr. 1/190, Ins 14-16”

The evidence notation provided by the Postal Service Tr. 1/190, Ins 14-16 is misleading given that just a few lines later, lines 20-25 and continuing on the following page to line 3, it is clarified that this software is not provided by Microsoft, but instead by the Postal Service from their USPS EPM web site ⁸.

⁸ Additional evidence at Tr 1/173 lines 13 and continuing to the next page line 12 showing that the Postal Services publishes this software, not Microsoft. And, Tr 1/175 lines 1-6. And, Tr 1/176 lines 23 to next

The return receipt function of the USPS EPM is provided **exclusively** by USPS EPM software (DIGISTAMP-SRT-1/ 14 Ins 38 continued to next page 2). *In fact, this USPS EPM delivery function, by design, prevents use of the Microsoft Outlook email receipt function.* Therefore, this sentence could not possibly be more wrong.

The next sentences: “The Microsoft Word plug-in enables a message transfer as long as the customer also has an internet service provider. The USPS EPM does not engage in that transfer. Tr. 1/194, Ins 5-7”

The evidence notation provided by the Postal Service Tr. 1/194, Ins 5-7 is misleading given later, after the break when Mr. Foti could check his facts, Mr. Foti corrected his mistake at Tr. 227 lines 8-25.⁹

This statement in their brief is simply obfuscation and false. The fact that the public must have an Internet provider in order to use electronic communications is obviously true. But we have established, in summary, that the ***Postal Service computers are integral to the transfer process whenever a USPS EPM is used; one simply cannot use a USPS EPM without going through a Postal Service’s owned or leased and operated computer.*** When using the Postal Service’s *USPS EPM® Extension for Microsoft® Office*, the user’s document travels from the sender’s computer to the Postal Service data center (Tr. 1/227 Ins 8-25 and DIGISTAMP-SRT-1/11 Ins 4-5); the Postal Service composes an email and attaches the user’s document; then the Postal Service sends the email

page line 2. And, when the customer installs the software they agree to a license for the software that is an agreement between the customer and the Postal Service – no other parties Tr 1/174 line 14-22. The facts were further clarified in testimony DIGISTAMP-SRT-1 page 3 lines 18-20, page 5 lines 7-10, page 11 lines 5-6, and page 12 lines 1-2

⁹ The document delivery function provided by the Postal Service’s USPS EPM product was the subject of the vast majority of DigiStamp Surrebuttal testimony for which the Postal Service never questioned. Specifically DIGISTAMP-SRT-1 in the section “The USPS EPM® is a document delivery service” pages 2-5 and the section “The *USPS EPM®* is an Electronic Courier Service” on page 10-15.

to the addresses (Tr. 1/179 Ins 15-17 and Tr. 1/262-263 and DIGISTAMP-SRT-1/4 Ins 3-5).

Continuing, the Postal Service says, “Within the Microsoft Word extension is an application which uses as a component the USPS EPM. Tr. at 1/199, Ins 12-14. In addition, use of this particular application feature is minimal. Messaging applications, including the return receipt feature within Microsoft Outlook, are less than one percent of all USPS EPM transactions.”

The evidence notation provided by the Postal Service Tr. 1/199, Ins 12-14 is misleading given that just a few lines later, lines 15-25 and continuing on the following page to line 3, it is clarified that this software is not provided by Microsoft, but instead by the Postal Service exclusively from their USPS EPM web site¹⁰.

Since the *USPS EPM Extension for Microsoft Office* disables the Microsoft Outlook “return receipt” function, it is certainly true that use of this feature in sending USPS EPM’s is minimal—it is, in fact, zero. One simply **cannot** use the Outlook return receipt function with the *USPS EPM Extension for Microsoft Office*. But for the Postal Service to offer this tautology, as if it were a statement of fact about how Outlook is used, is simply wrong—and has no bearing on the point at issue.

Digistamp does not claim that Microsoft Outlook¹¹ is required for the customer to use the USPS EPM, contrary to the inaccurate characterization of our position by the Postal Service. We know that Microsoft Outlook is not involved in, is not part of, and is not used by this USPS EPM service. Microsoft Outlook is not involved

¹⁰ Additional evidence at Tr 1/173 lines 13 and continuing to the next page line 12 showing that the Postal Services publishes this software, not Microsoft. And, Tr 1/175 lines 1-6. And, when the customer installs the software they agree to a license for the software that is an agreement between the customer and the Postal Service – no other parties Tr 1/174 line 14-22. The facts were further clarified in testimony DIGISTAMP-SRT-1 page 3 lines 18-20, page 5 lines 7-10, page 11 lines 5-6, and page 12 lines 1-2.

¹¹ Microsoft Outlook is “a” way to retrieve emails but is not required and there are many software programs that can perform this particular function. In the test we are describing here we used alternative software of Google’s gmail and a web browser.

at all in the sending of USPS EPMs and need not even be installed on the computers.

Since the Postal Service has at this late date introduced “facts” that are blatantly false, misleading, and defeating of the Commission’s charge for this docket (to clarify the nature of the USPS EPM), DigiStamp provides this description in our reply brief to be added to the record to serve in providing a true account of the USPS EPM.

It was noted by the Postal Service that “[DigiStamp’s] initial brief contains not one single citation to the Record”¹². Given that concern, the portion of DigiStamp’s initial brief that directly relates to this topic of the Postal Service’s misleading statements is provided with citations:

- a) The Postal Service’s EPM customer—whether sending an e-mail, a computer-based fax, or any other document—creates a document, selects to secure it through an EPM (generally using *USPS EPM® Extension for Microsoft® Office*), and hits “Send.” (DIGISTAMP-SRT-1/4 Ins 1-2 and DIGISTAMP-SRT-1/11 Ins 5-6)
- b) The computer then uses Internet protocols (TCP/IP) to break the document into packets and send them out across the Internet to the Postal Service (Tr. 1/227 Ins 8-25 and DIGISTAMP-SRT-1/11 Ins 4-5).
- c) The Postal Service data center—using a computer owned, leased, or otherwise under contract to, the Postal Service—then collects all the packets and reassembles them into the document (Tr. 1/227 Ins 8-25).
- d) The Postal Service computer creates an email that is to be sent to each of the customer’s specified recipients. The Postal Service attaches the user’s document to the outgoing email and then the

¹² Reply of the United States Postal Service in Opposition to DigiStamp’s Motions to Supplement Surrebuttal Testimony and to Delay Reply Briefs

Postal Service sends the e-mails to the specified recipients (Tr. 1/179 Ins 15-17 and Tr. 1/262-263 and DIGISTAMP-SRT-1/4 Ins 3-5).

- e) The recipient of the email must install the Postal Service's EPM software to be allowed to view the original document (Tr. 1/185 Ins 3-12 and Tr. 1/188 Ins 16-25).
- f) The recipient of the document signifies that they accept delivery and then the Postal Service EPM software decrypts the document and completes the delivery (Tr. 1/229 Ins 2-8).

The Postal Service argument of *de minimis* is not based in fact.

Page 27 of the Postal Service's Brief:

In addition, use of this particular application feature is minimal. Messaging applications, including the return receipt feature within Microsoft Outlook, are less than one percent of all USPS EPM transactions. OCA/USPS-RT-1-25, Tr.1/166. No reasonable attempt to assess and classify the nature of the product can focus exclusively on such a *de minimis* fraction of its usage by actual customers.

The argument *de minimis* fraction is not supported by the data available in this Docket. Consider, the only data that we do have is transaction based: Given that one customer accounts for 85% of the transactions (Tr. 1/201 Ins 15-17), then there is some natural distortion of percentages depending on what question you ask. If we knew, for example, what percentage of the customers use the *USPS EPM® Extension for Microsoft® Office* then the prevalent usage statement could be quite different. The Postal Service has referred to other message applications (Tr. 1/270 Ins 11-16). In addition, DigiStamp added to the record a source of an additional counting of customers in that several state's legislators have passed laws where the USPS EPM replaces certified mail.¹³ From this perspective, where the usage of one large customer is normalized, then the

¹³ Tr. 1/195 In 22 continuing to 196 In 12. And in Motion to Notify the Postal Rate Commission of A Recent Example Where the Use of USPS EPM Replaces Traditional Mail Service and USPS/DS-T1-7 "Legislation was passed or was in-progress: South Carolina, West Virginia, Maryland, Nebraska, Pennsylvania and New Jersey."

“percentage of customers” that use the USPS EPM for document delivery and/or a replacement for certified mail might be quite large. Given the usage data is incomplete and that the Postal Service has been prone to mistakes when characterizing how the service works in a messaging context, then any statement of “on such a *de minimis* fraction of its usage by actual customers” is unfounded given the evidence available.

Refute the Postal Service argument of “The largest customer of the USPS EPM does not use it in a communication process”

DigiStamp’s Surrebuttal Testimony (pages 8-9) refuted these claims that are now restated in the Postal Service’s Initial Brief (page 25). DigiStamp’s testimony went unchallenged during the Surrebuttal. Below are significant excerpts of the testimony that refuted the Postal Service’s argument. Specifically—for their largest customer and the fax communications at issue—the fax communication of these Doctor’s orders cannot be completed without attaching a USPS EPM. As we show again, the EPM is, at a minimum, ancillary to this communication process:

DIGISTAMP-SRT-1/9 Ins 7-9:

Only when information has been ***sent and received in an accessible form*** has communication happened. And the fax customer simply, unequivocally ***cannot*** access the information transmitted prior to the attachment of the EPM.¹⁴

DIGISTAMP-SRT-1/9 Ins 13-19:

So even though the USPS has one big customer that uses fax-to-computer as its form of communication, and even though the USPS would like the Commission to believe that this somehow changes the nature of the EPM, the fact remains that the communication between sender and recipient cannot be accomplished until the USPS computers receive a request for an EPM, send that EPM, and retain the record. USPS computers and processes ***intervene between*** the sender’s transmission of and the recipient’s access to the information.¹⁵

¹⁴ Additionally supported by DigiStamp/USPS-RT1-3 item 2

¹⁵ Additionally supported by TR 1/211 Ins 1-10

Given this Docket's stated objective to clarify the nature of the USPS EPM, then these proceedings would have been better served if the Postal Services had participated at the time of DigiStamp's Surrebuttal Testimony.¹⁶

Additional information related to the Postal Service argument "the service portion of 3662 is plainly not relevant".

On page 4 of the Postal Service Initial Brief they argue:

"Because DigiStamp makes no allegations regarding postal services that it is "receiving," the "service" portion of section 3662 is plainly not relevant."

DigiStamp has been an occasional user of the USPS EPM service. DigiStamp has used the USPS EPM electronic courier function in this case; specifically, to send documents to 22 people (AUTH/DS-T1-11). Also, DigiStamp used the Postal Service web site to create a USPS EPM account and retrieved time stamps before the complaint was filed.

Response to Postal Service argument "a United States district court is the appropriate forum".

On page 4 of the Postal Service Initial Brief they argue:

"a United States district court is the appropriate forum".

DigiStamp provided its argument to this same issue in DigiStamp's Response To Motion of the United States Postal Service to Dismiss, page 4 – 6. Given that this issue has not changed during these proceedings, it is best not to copy and

¹⁶ Similarly, the Postal Service never responded to DigiStamp's Motion to Notify the Postal Rate Commission of A Recent Example Where the Use of USPS EPM Replaces Traditional Mail Service. And to the same point, the section of DigiStamp's Surrebuttal testimony, "The USPS EPM is an Electronic Courier Service, and therefore within the jurisdiction of the Commission".

paste the details of these 3 pages into this document. In summary, the three pages of that argument state:

The Postal Service contends the better procedure and one that has been historically followed is for complaints of this nature to be filed with the district court rather than with this Commission. But even if such a procedure is available to DigiStamp, it does not necessarily foreclose Commission action here....

Response to Postal Service argument “Reliance by the Commission on Its New Rule Would Constitute Improper Retroactive Agency Action”.

DigiStamp contends that the USPS EPM is a postal service under both the new definition and the prior standards (DS-T1 pages 5-8). But, more relevant is that Order 1455 on page 18 set the definition to be used in this Docket as that which was defined in Docket No. RM2004-1. Alternatively, would the Postal Service suggest that DigiStamp should re-file this complaint tomorrow and then we can start over with the new definition? That would only cause a great deal of extra work and delay.

Gaps in the Postal Service’s “History of the USPS EPM”

The historical summary in the Postal Service’s USPS EPM Product lacks two important subject areas:

1. The Docket was limited by Order 1455 to the nature of the USPS EPM and therefore some probative questions about the history of USPS EPM were not or could not be asked (TR 235 Ins 1-2 TR 235 line 22 continuing to next page line 6).
2. Many of the probative questions asked of the Postal Service about the history they provided of the USPS EPM were not answered. Lacking answers to some of the more important, probative questions gives less merit to the history that the Postal Service provides. Too often the response was that the Postal Service did not know the answers,

examples: DigiStamp/USPS-RT1-1 DigiStamp/USPS-RT1-4 item 2 TR
1/223 Ins 16-25 TR 1/223 Ins 16-25 TR 1/233 Ins 7-25 TR 1/224 Ins 1-22
OCA/USPS-RT1-3,6,7,8,10,11,15,19,20,21

Response to Postal Service's "Description of the USPS EPM"

On page 23 of the Postal Service Initial Brief they provide their "Description of the USPS EPM". It is crucial for the reader to understand and that this record reflects that none of the methods and inventions described here by the Postal Service was in fact developed, conceived or invented by the Postal Service. There was no evidence presented or could be presented to prove otherwise. The USPS EPM product uses technical solutions that were development by private industry and was part of the larger effort to improve electronic data integrity (Tr. 1/219 line 23 continuing to page 225 line 25 and DS-T1 page 12 unnumbered lines 4-11 and page 14).