

**BEFORE THE POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-001**

Service Standards and Performance Measurements)
For Market Dominant Products)
Docket No. PI2007-1)

REPLY COMMENTS

Pursuant to the Commission's June 13, 2007 "Notice of Request for Comments on Modern Service Standards and Performance Measurement for Market Dominant Products," Stamps.com Inc. ("Stamps.com") hereby submits our comments. We thank the Postal Regulatory Commission ("PRC") for the opportunity to submit these brief comments, directed to Performance Measurements.

PERFORMANCE MEASUREMENTS

We believe Intelligent Mail can play a crucial role in the USPS efforts, in consultation with the PRC, to establish performance measurements for market-dominant products. The USPS plans to install and operate equipment and software that will make it possible to track the location of letters and flats that have an Intelligent Mail barcode within the USPS infrastructure in real time. This will provide an unprecedented amount of new data that will allow measurement of the performance of the USPS network in real time.

The Stamps.com customer base represents well over 400 thousand registered users that originated nearly 200 million mail pieces last year, and we believe that (with the right financial incentives) the PC Postage industry could grow to represent millions of users and billions of

pieces of mail. For smaller mailers, PC Postage is the easiest and most cost effective way to print Intelligent Mail barcodes. The data provided by the large amount of Intelligent Mail originated by the PC Postage industry provides a great amount of data from which the USPS could measure its network performance.

In addition, the Intelligent Mail data from PC Postage differs from the Intelligent Mail data from large mailers in at least two significant ways. First, current small business PC Postage customers include many rural and remote locations as opposed to the urban concentration of large mailers. Second, PC Postage customers tend to utilize blue collection boxes and carrier pickup for depositing their mail whereas large mailers tend to drop mail at commercial drop locations. Thus, information available from the Intelligent Mail barcodes from users of PC Postage could be used as an effective and balanced sample of the USPS network performance across the nation, including the more geographically remote parts of the network, and including the portions of the USPS network that are not typically utilized by large mailers.

PC Postage can also provide information about the history of a mail piece that predates its entry in to the USPS system. This information, when combined with the USPS scan information can allow for measurement time frames all the way back to the initial printing of postage and including the initial induction of the mail piece into the USPS network. This would allow for more and better measurement of the effectiveness of induction methods relevant to small mailers, such as collection boxes and carrier pickup.

Unfortunately, today small mailers have to pay more out of pocket to use PC Postage and print an Intelligent Mail barcode than to use traditional methods and send mail without a barcode. We believe a justifiable workshare discount available to small business and consumer

mailers is the answer to encourage more Intelligent Mail from small mailers so as to provide as much data for performance measures as possible.

Stamps.com again thanks the PRC for the chance to provide our comments.

Respectfully submitted,

/s/ Seth Weisberg

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