

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

---

REVIEW OF NONPOSTAL SERVICES

---

Docket No. MC20008 - 1

DECLARATION OF RANDALL E. HOOKER IN RESPONSE TO ORDER NO. 154 DATED  
JANUARY 29, 2009

RANDALL E. HOOKER states and declares, under penalty of perjury and upon his personal testimonial knowledge, that he is in all respects competent to testify in this matter and states as follows:

1. I am the Managing Member of Pinpoint, LLC, a Washington State limited liability company located at 16541 Redmond Way, Suite 170, Redmond, Washington 98052 ("Pinpoint"). This Declaration is in response to the letters submitted to the Commission by the Chamber of Commerce of the United States of America (the "Chamber of Commerce") and the Information Technology Industry Council ("ITIC") on November 19, 2008 and November 20, 2008, respectively.

2. As stated in my previous declarations, Pinpoint LLC is the manufacturer of postage meter ink cartridges bearing the USPS brand. In my previous declarations, I have attempted to provide information which Pinpoint believes is relevant to these proceedings. While I will not repeat my earlier statements here, I stand by those statements and incorporate them into this submission by reference. In this Declaration, I wish to provide additional

information and to point out some of the flaws and misconceptions provided by Pitney Bowes and other parties who have submitted information to the Commission.

3. Alt 3 The postage meter market is essentially a “cul de sac” with three authorized “landlords”; Pitney Bowes, NeoPost/Hasler (both brands owned by a single parent company) and FrancoTyp Postalia. They exist because the USPS grants them the authority to participate in this market. The barriers for others to enter the market are high. If this were not the case, major electronic and print device manufacturers such as Hewlett Packard, Canon, Ricoh and Xerox would be competing in this space.

4. The Postal Evidencing Systems provided by the “Big Three” mentioned above require specific ink to meet readability standards established by the USPS. This ink, imbedded in the evidencing system in the form of a cartridge, is a critical and integral part of the postal product it creates; the USPS conforming indicia. The equivalent of a stamp.

5. The lack of competition for postage meter ink cartridges is evidenced by the fact that none of the “Big Three” produce ink cartridges for use in their competitors evidencing systems. There is no cross-competition between the dominant vendors for this critical component of the various mailing systems. This contradicts natural market tendencies and has the appearance of complicity to refrain from competition on the part of the “Big Three” in this market.

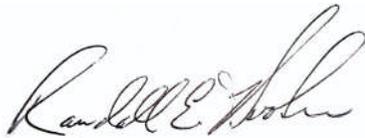
6. Pitney Bowes takes measures to insure that consumers purchase their brand of ink cartridges in ways that could be construed as a violation of Federal law. Specifically the following statement in user’s manuals “Warning! You must only use ink cartridges supplied by Pitney Bowes. The use of any other ink cartridge will void your warranty and

maintenance agreement.” See, Ex. A. The Magnuson-Moss Warranty Act prohibits this caveat to warranty rights unless the consumables are provided to the user at no charge.

7. Without competition, this type of consumer control often goes unchecked. It is evidence of Pitney Bowes’ virtual monopoly, and the lack of competition, that they have not been challenged on these statements

8. Pinpoint is a private sector entity, not a Government sponsored enterprise. What Pinpoint produces enures to the benefit of the general marketplace of mailers by reducing the cost of producing the USPS authorized equivalent of a stamp.

9. Pinpoint manufactures an essential component of evidencing systems, and like the “Big Three”, should enjoy the same opportunity of relationship rights with the USPS.



---

Randall E. Hooker  
Managing Member  
Pinpoint LLC  
16541 Redmond Way, Suite 170  
Redmond, WA 98052  
Telephone: 425-442-4764  
E-Mail: [randyhooker@pinpointllc.com](mailto:randyhooker@pinpointllc.com)

January 29, 2009

---

**DM500™ and DM550™ Digital Mailing System Operating Guide**

---

**Replacing the Ink Cartridge**

“Low Ink - Order Ink” appears on the IntelliLink® Control Center main screen when there is only enough ink for approximately 10 days of mailing. You can choose to ignore this warning - refer to the *Configuring Low Ink Warning* section in *Chapter 5* in this guide.

Your actual ink usage will vary depending on whether you routinely print advertisements or inscriptions and how many pieces of mail you print per day.

“Low Ink” displays approximately two days before the ink runs out. You can print about another 300 meter stamps or leave the mailing system running for six days without printing. If you do not have a replacement cartridge, order one now. Refer to *Supplies and Options, Chapter 11* in this guide.

“Out of Ink” displays when there is no more ink left in the cartridge and your mailing system stops printing. In order to resume printing you must change the ink cartridge.



**WARNING!** You must use only ink cartridges supplied by Pitney Bowes. The use of any other ink cartridges will void your warranty and maintenance agreement.

**WARNING!** The ink in the cartridge may be harmful if swallowed. Keep new and used cartridges out of reach of children. Discard empty cartridges immediately

**WARNING!** Do not remove the ink cartridge if the printhead is not installed. If the ink cartridge and printhead are removed at the same time, ink from the print supply line will flow down the tube and squirt from the needle in the ink cartridge holder out into the printer and system interior.

**WARNING!** Make sure there is enough room to fully lift the main cover without bumping the IntelliLink® Control Center.

---

## 9 • Maintaining and Updating

### **Cleaning the Printer Nozzle**

You can clean the printer nozzle at any time by following these steps:

1. From the IntelliLink Control Center, press the **Menu** key.
2. Select **Maintenance**.
3. Select **Clean Printer Nozzle**. The “Cleaning Print Nozzle” screen displays until the cleaning operation completes.
4. Once the cleaning operation completes, the “Print Test Pattern” screen appears.
5. Print a test pattern as described above in Printing a Test Pattern to verify that you can print a clean and clear meter stamp.
6. Repeat this operation at least one more time.

### **Replacing the Ink Cartridge**

“Order Ink” appears on the IntelliLink Control Center main screen when there is only enough ink for approximately 10 days of mailing.

Your actual ink usage will vary depending on whether you routinely print advertisements or inscriptions and how many pieces of mail you print per day.

“Low Ink” displays approximately two days before the ink runs out. You can print about another 300 meter stamps or leave the mailing system running for six days without printing. If you do not have a replacement cartridge, order one now. Refer to *Chapter 11, Supplies and Options* in this guide.

“Out of Ink” displays when there is no more ink left in the cartridge and your mailing system stops printing. In order to resume printing you must change the ink cartridge.



**WARNING!** You must use only ink cartridges supplied by Pitney Bowes. The use of any other ink cartridges will void your warranty and maintenance agreement.

**WARNING!** The ink in the cartridge may be harmful if swallowed. Keep new and used cartridges out of reach of children. Discard empty cartridges immediately.

**WARNING!** Do not remove the ink cartridge if the printhead is not installed. If the ink cartridge and printhead are removed at the same time, ink from the print supply line will flow down the tube and squirt from the needle in the ink cartridge holder out into the printer and system interior.

**WARNING!** Ensure there is enough room to fully lift the main cover without bumping the IntelliLink Control Center.

## 9 Maintaining and Updating

### Replacing the Ink Cartridge

When the ink supply falls below a certain level, your machine displays a first warning to **Order Ink**. At this point there is only enough ink for approximately 10 days of mailing.

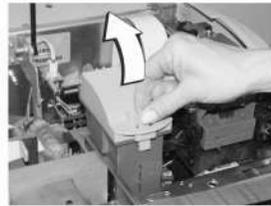
A second warning of **Low Ink** displays approximately two days before ink runs out.

When the ink runs out, an **Out Of Ink** message appears on the screen and the machine stops printing. In order to resume printing you must change the ink cartridge.

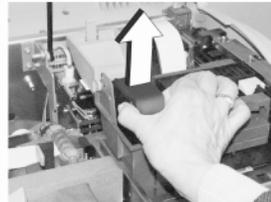
**NOTE:** Use only Pitney Bowes ink cartridges. The use of any other ink cartridges will void your warranty and Maintenance Agreement.

#### How To Replace the Ink Cartridge

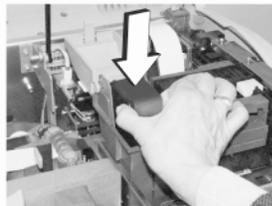
1. Lift up the main cover. Locate the printer and ink cartridge.
2. Press the thumb tab on the ink cartridge cover to lift open.
3. Lift up ink cartridge cover. Bring cover all the way back. This will lift up the ink cartridge for easy removal.
4. Remove the old ink cartridge by lifting it out of the holder.
5. Insert new ink cartridge as shown in picture with the grooves of the case facing you.
6. Close the ink cartridge cover until you hear it snap. This will return the ink cartridge to its proper position.
7. Close the main cover.



Lift up cover



Remove Ink Cartridge



Insert New Ink Cartridge



Close Ink Cartridge Cover