

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

COMPLAINT ON ELECTRONIC POSTMARK

DOCKET NO. C2004-2

**AUTHENTIDATE, INC.'S FIRST SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS
TO DIGISTAMP, INC. WITNESS RICK BORGERS
(AUTH/DS T1-1 through 11)**

Pursuant to sections 25 through 27 of the Rules of Practice of the Postal Rate Commission, AuthenntiDate, Inc. (AuthentiDate) directs the following interrogatories and requests for the production of documents to DigiStamp, Inc. witness Rick Borgers:
AUTH/DS T1-1 through 11.

Respectfully submitted,

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**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
OF AUTHENTIDATE, INC. TO DIGISTAMP, INC. WITNESS RICK BORGERS**

AUTH/DS-T1-1. Describe the e-TimeStamp product. Please explain fully.

a. Does DigiStamp hold any patents related to the e-TimeStamp product? If so, provide the patent number.

AUTH/DS-T1-2. Page 12 of the Direct Testimony of Rick Borgers states DigiStamp has already provided service to thousands of customers. Identify each customer of DigiStamp's e-TimeStamp product by name and address. Include companies, research organizations and governments. Please explain fully.

a. For each such customer, describe how that customer was using the e-TimeStamp product.

b. For each customer, describe when the customer made its first purchase of the e-TimeStamp product.

AUTH/DS-T1-3. Provide the number of employees of DigiStamp in each year from 1999 to the present.

AUTH/DS-T1-4. Provide revenue figures of DigiStamp in each year from 1999 through 2005 as such amounts appear on DigiStamp's tax returns. Please explain fully.

AUTH/DS T1-5. Identify each customer that switched from using DigiStamp's e-TimeStamp to USPS' Electronic Postmark Service (EPM). Please explain fully.

AUTH/DS-T1-6. Identify each prospective customer of DigiStamp's that became a user of the EPM instead of the DigiStamp e-TimeStamp product. Please explain fully.

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a. For each such prospective customer, identify who DigiStamp had contact with at that prospective customer and when such contact was made.

AUTH/DS-T1-7. Describe your understanding of how the EPM works. Please explain fully.

a. Describe your understanding of how the EPM is being used in the marketplace.

AUTH/DS-T1-8. In how many time stamp transactions has DigiStamp's product been used? Please explain fully.

a. What percentage of such transactions were communications?

b. What was the total revenue derived from such transactions?

AUTH/DS-T1-9. Footnote 13 on page 9 of the Direct Testimony of Rick Borgers refers to DigiStamp's original business plan. Please provide the referenced business plan.

AUTH/DS-T1-10. Please identify DigiStamp's "costs" referred to in the first paragraph on page 13 of the Direct Testimony of Rick Borgers. Please explain fully.

AUTH/DS-T1-11. Identify each time that DigiStamp has demonstrated through a transmission to the USPS or a governmental identity that a person can "get a certified receipt from the USPS for a document that, in fact, was never received." Please explain fully.

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a. For each transmission, describe (i) the date of the transmission, (ii) the recipient of the transmission and (iii) what DigiStamp did to create the false certified receipt.

b. Have you or anyone else at DigiStamp ever attempted to obtain a certified receipt for a document that was, in fact, never received and failed to obtain the certified receipt?

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of May, 2006 a copy of AuthentiDate Inc.'s First Set of Interrogatories was served upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

/s/ Andrea T. Vavonese

Andrea T. Vavonese