

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO GRAYHAIR SOFTWARE WITNESS BELLAMY
(USPS/GHS-T5-1-2)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to Grayhair Software witness Bellamy: USPS/GHS-T5-1 to 2.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; Fax -6187
September 19, 2006

USPS/GHS-T1-1.

Please provide an estimate of how many customers use Grayhair Software as a reseller of Confirm Service? An exact number is not required.

USPS/GHS-T1-2.

On page three, lines 18-20, of your testimony you state:

What is of most importance is not the subscription fees, but avoidance of per-scan charges that will limit the market for the service.

(a) Please provide a detailed explanation of why avoiding per-scan charges is so important.

(b) Would you continue to make avoidance of per-scan charges the priority if it required substantially higher subscription fees than under the OCA proposal? Please explain.

(c) Is it possible that some resellers could benefit under a pricing structure with per scan charges, compared to a pricing structure with subscription fees only? Please explain your response.