

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSES OF UNITED STATES POSTAL SERVICE
WITNESS KINGSLEY TO INTERROGATORIES OF KEYSpan ENERGY
(KE/USPS-T39-15-16)

The United States Postal Service hereby provides the response of witness Kingsley to the following interrogatories of Keyspan Energy: KE/USPS-T39-15-16, filed on November 14, 2001.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Joseph K. Moore

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November 28, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF KEYSpan ENERGY

KE/USPS-T-29(sic)-15

Please refer to the table that you were asked to complete in response to Part F of Interrogatory KE/USPS-T29(sic)-13.

- A. Please provide the projected test year after rates volumes and percentages by filling in the following table.

Subclass	Letters with USPS Applied Barcodes	Letters with Mailer Applied Barcodes	Letters Without Barcodes	Total Letters
TY 2003				
First Class Standard Total				
First Class Standard Total				100% 100% 100%

- B. Please provide a full explanation as to why the Postal Service will not barcode the volume and percentage of First-Class letters that you indicate will not be barcoded in the test year. In your explanation, please indicate during what processing operation (i.e., AFCA (sic), outgoing ISS, outgoing OSS, outgoing BCS primary etc.) the Postal Service determines that such letters cannot be barcoded.

Response:

- A. The Test Year 2003 barcode projections have not yet been determined.
- B. See response to KE/USPS-T-39-13C.

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KE/USPS-T-39-16

Please refer to your response to Part G of Interrogatory MMA/USPS-T39-4. There you provided the volumes resolved by RCR and REC during FY 2001. Please fill in the following table, making corrections if necessary.

**First-Class Letters Barcoded in FY 2001 and TY 2003
'(000)**

First-Class Single Piece	RCR Resolved	REC Resolved	Prebarcoded	Not Barcoded	Total Volume
FY 2001	15,316,444	8,343,459			
Projected TY 2003					47,899,389

Response:

See response to KE/USPS-T-39-15A and KE/USPS-T-39-3B regarding Test Year projections.

See KE/USPS-T-39-13 for First-Class Mail prebarcoded and non-barcoded volumes for FY 2001.

See response to KE/USPS-T-39-6F redirected to witness Miller for projected Test Year RCR and REC resolved figures.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Joseph K. Moore

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