

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES

Docket No. R2000-1

**KEYSPAN ENERGY'S
FIRST SET OF INTERROGATORIES AND
DOCUMENT PRODUCTION REQUESTS
TO USPS WITNESS SHARON DANIEL**

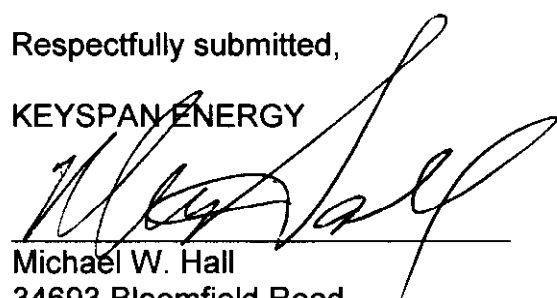
Pursuant to Rules 25 and 26 of the Commission's Rules of Practice,
KeySpan Energy submits the following interrogatories and document production
requests to United States Postal Service witness Sharon Daniel: **KE/USPS-T28-**

1. If the designated witness is unable to answer any of these questions, please
direct them to the appropriate witness who can provide a complete response.

Respectfully submitted,

KEYSPAN ENERGY

By:


Michael W. Hall
34693 Bloomfield Road
Round Hill, Virginia 20141
540-554-8880
Counsel for
KeySpan Energy

Dated: Round Hill, VA
February 14, 2000

**KeySpan Energy's First Set Of Interrogatories
And Requests For Production Of Documents
To USPS Witness Sharon Daniel**

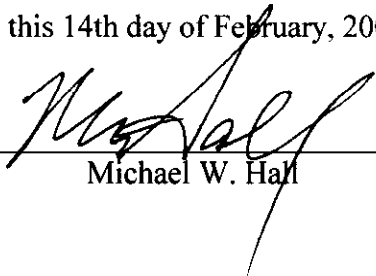
KE/USPS-T28-1 On page 20 of your testimony you discuss delivery cost differences caused by shape, DPS, and high density and saturation presorting for First-Class Mail Presort, Periodicals, and Standard Mail (A). This interrogatory addresses the delivery costs of First-Class automation-compatible letters received by an addressee in high volumes.

- (a) If one addressee receives consistent high volumes of mail (10,000+ pieces per day), does the Postal Service fill a dedicated delivery truck (separate from mail addressed to other locations) in order to take the mail to the premises of that one addressee? If not, how does the Postal Service facilitate the delivery of such large volumes?
- (b) Does such a delivery described in part (a) occur rarely or frequently?
- (c) Compared to the cost of delivery for an average First-Class letter, does such a delivery described in part (a) cost more or less on an average unit basis? Please support your answer.
- (d) Would the Postal Service prefer to deliver high volumes of mail to the premises of an addressee, or have the addressee pick up the mail at the office of delivery, such as from caller or box service? Please support your answer.
- (e) What percent of Courtesy Reply Mail that is received in high volumes is addressed to a post office box? Please support your answer.
- (f) What percent of Qualified Business Reply Mail that is received in high volumes is addressed to a post office box? Please support your answer.
- (g) What percent of all Qualified Business Reply Mail is addressed to a post office box? Please support your answer.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing discovery request upon the United States Postal Service, Ted P. Gerarden, the Designated Officer of the Commission, and participants who requested service of all discovery documents, in compliance with Rules 12, 25, and 26 of the Commission's Rules of Practice And Procedure.

Dated at Round Hill, VA this 14th day of February, 2000.



Michael W. Hall