

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

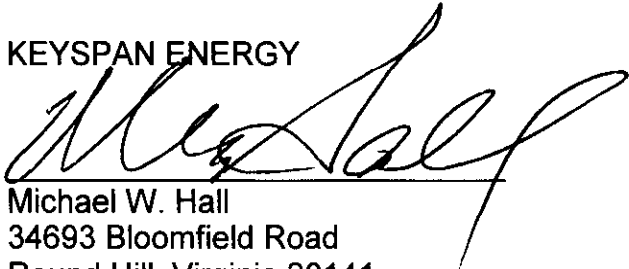
**First Set Of Interrogatories And Requests For Production Of Documents  
OF KeySpan Energy  
To USPS Witness Linda A. Kingsley**

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 Linda A. Kingsley: **KE/USPS-T10-1-4**. 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:

  
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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 Linda A. Kingsley**

**KE/USPS-T10-1** On page 2 of your prepared testimony you note that the Advanced Facer Cancellor System culls out nonletter-sized pieces over 6 1/8 inches tall, over ¼ inch thick or over 11 ½ inches long. Is there a weight limitation above which a standard size letter will be culled out? If so, what is that weight limitation and how was it determined?

**KE/USPS-T10-2** In your description of the Remote Bar Coding System on page 5 of your prepared testimony, you mention that the address is resolved to the depth of sort required, either 5, 9 or 11 digits.

- (a) What are the circumstances under which the 5, 9 and 11 digit depths of sort are required?
- (b) If only a 5 or 9 digit zip code is required and the letter is barcoded as such, how are the letters eventually sorted to carrier sequence in the delivery office?

**KE/USPS-T10-3** On pages 5 and 6 of your prepared testimony you describe a Delivery Bar Code Sorter (DBCS) and a Carrier Sequence Bar Code Sorter (CSBCS).

- (a) What is the current cost for the Postal Service to employ such a machine at a facility which has no such equipment deployed?
- (b) If a recipient with its own unique 11-digit zip code consistently receives 5,000 or more letters per day, how likely is it that such mail would be separated to the final addressee in the incoming secondary sortation?
- (c) What volume to a specific addressee is generally necessary in order to have a bin specified for that addressee in the incoming secondary sortation?

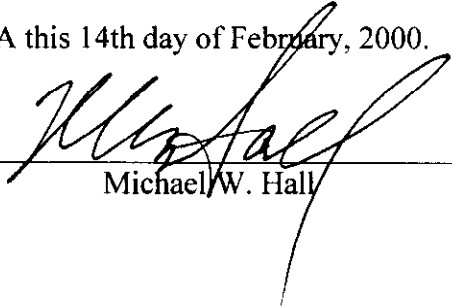
**KE/USPS-T10-4** On page 6 of your testimony you describe the Mail Processing Bar Code Sorter (MPBCS), which has 96 bins and is used primarily for the outgoing primary and incoming primary operations.

- (d) If a recipient with its own unique 11-digit zip consistently receives 5,000 or more letters per day, how likely is it that such mail would be separated to the final addressee in the incoming primary sortation?
- (e) What volume to a specific addressee is generally necessary in order to have a bin specified for that addressee in the incoming primary sortation?

**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.

  
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Michael W. Hall