

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 Second Set Of Interrogatories And
Requests For Production Of Documents And Inspections
To United States Postal Service Witness Chris F. Campbell**

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 Chris F. Campbell: **KE/USPS-T29-23**. 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
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Dated: Round Hill, VA
February 25, 2000

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To United States Postal Service Witness Chris F. Campbell**

KE/USPS-T29-23 According to USPS witness Mayo, in the test year after rates the Postal Service expects to sort and count about 154 million QBRM letters to "high volume" recipients and about 308 million QBRM letters to "low volume" recipients. See USPS-T-39, WP-5. According to USPS witness Campbell, 45.9% will be distributed manually and 66.5% will be counted manually at 951 pieces per hour. See USPS LR-I-160, pages 2 and 3.

- (a) Please confirm that the Postal Service expects to hand count approximately 462 million pre-approved, prebarcoded automation-compatible QBRM letters in the test year. If you cannot confirm, please provide the correct number of pre-approved, prebarcoded automation-compatible QBRM letters the Postal Service expects to hand count in the test year, and provide copies of all source documents or references to relevant portions of the record.
- (b) Please confirm that the Postal Service expects to spend about 485,000 manhours hand counting pre-approved, prebarcoded automation-compatible QBRM letters in the test year. $[462,000,000 / 951 = 485,804]$. If you cannot please provide the correct number of manhours and provide copies of all source documents or references to the relevant portions of the record that were used to derive the number.
- (c) What is the productivity for manually distributing (and not counting) QBRM letters?
- (d) What is the productivity for manually counting (and not distributing) QBRM letters?
- (e) Please state at which of the following average daily volume levels (pieces per day) the Postal Service can be confident that an individual QBRM recipient's reply letters will consistently receive some form of automated counting or bulk counting (such as weight conversion techniques) rather than manual counting in postal facilities where QBRM is processed:
 - 1. 1000;
 - 2. 1500;
 - 3. 2000;
 - 4. 2500;
 - 5. 3000;
 - 6. 3500;
 - 7. 4000;
 - 8. 4500;

- 9. 5000.
- 10. 5000+

- (f) How does the Postal Service categorize the processing method used to distribute the QBRM reply letters of Brooklyn Union Gas Company that are processed at the Postal Service's mail facility located at 1050 Forbell St. Brooklyn, New York?
- (g) How does the Postal Service categorize the processing method used to count the QBRM reply letters of Brooklyn Union Gas Company that are processed at the Postal Service's mail facility located at 1050 Forbell St. Brooklyn, New York?
- (h) Please identify at least 10 specific post office facilities where Postal Service employees routinely count manually the reply letters of QBRM recipients who receive "high" volumes? If possible, please include in the list of such Postal facilities at least three which are within 100 miles of Washington, D.C., and the mail facility identified in part (f), if applicable.
- (i) Please identify at least 10 specific post office facilities where Postal Service employees routinely count manually the reply letters of QBRM recipients who receive "low" volumes? If possible, please include in the list of such Postal facilities at least three which are within 100 miles of Washington, D.C., and the mail facility identified in part (f), if applicable.
- (j) Please arrange for counsel for the Postal Service to confer with counsel for KeySpan Energy to arrange mutually convenient times and procedures for the inspection and video taping of QBRM mail processing methods at the post office facilities identified in response to parts (h) and (i) of this interrogatory and video taping of interviews with, or depositions of, the field and management personnel responsible for processing QBRM at such facilities.

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 this 25th day of February, 2000.

Michael W. Hall
Michael W. Hall *SB*