

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, 2000

Docket No. R2000-1

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DANIEL TO INTERROGATORY OF KEYSpan ENERGY
(KE/USPS-T28—1)**

The United States Postal Service hereby provides the response of witness Daniel to the following interrogatory of KeySpan Energy: KE/USPS-T28—1, filed on February 14, 2000.

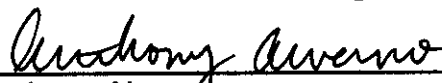
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anthony Alverno
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2997; Fax -6187
February 28, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL TO
INTERROGATORY OF KEYSpan ENERGY**

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.

RESPONSE:

- (a) It is my understanding that the Postal Service may fill a dedicated delivery truck in order to take the mail to the premises of an addressee who receives high volumes of mail. The Postal Service may also fill a larger truck with the mail of several customers who receive high volumes of mail in what is known as a "firm run."
- (b) Such deliveries occur as needed.
- (c) The unit cost of such deliveries would depend on the volume of mail being delivered.
- (d) It is my understanding that the Postal Service does not have a preference.
- (e) The Postal Service does not have information responsive to this request.
- (f) The Postal Service does not have information responsive to this request.
- (g) The Postal Service does not have information responsive to this request.

DECLARATION

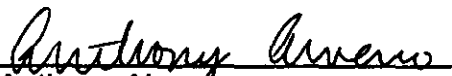
I, Sharon Daniel, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.


SHARON DANIEL

Dated: 2/28/00

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.


Anthony Alverio

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