

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

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POSTAL RATE AND FEE CHANGES

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R2000-1

**KeySpan Energy's
Fourth Set Of Interrogatories And Document Production Requests
To USPS Witness Chris F. Campbell**

Pursuant to Rules 25, 26, and 27 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-T29-49**. 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 / *PS*

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Counsel for
KeySpan Energy

Dated: Round Hill, VA
March 21, 2000

KE/USPS-T29-49 Using the database and search capabilities available through the PERMIT system, please provide for the base year and the most recent twelve month period for which data are available, a list of the 75 QBRM recipients who received the highest total volumes during such periods. For each high volume QBRM recipient identified as such from the PERMIT system, please provide, in tabular form, the following information from PERMIT data if available or other sources if PERMIT data does not include the requested information:

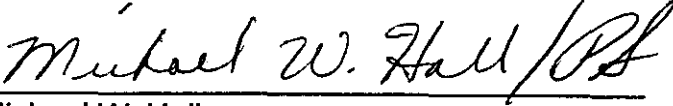
- (a) the location of the postal facility where such QBRM recipient receives its reply mail;
- (b) the total volumes of QBRM received during the relevant twelve month period;
- (c) how many different addresses the QBRM recipient maintains for QBRM at such postal facility;
- (d) if a listed QBRM recipient maintains more than one QBRM address at that facility, the volumes of QBRM delivered to each of the other addresses during the relevant periods;
- (e) whether the address printed on each of the QBRM recipient's reply piece is a post office box or a physical street address;
- (f) for recipients whose reply mail pieces are addressed to post office boxes, whether the QBRM recipient's reply mail pieces are picked up by the recipient or its designated representatives from the post office box or through firm holdout procedures, or whether postal service personnel routinely deliver the recipient's QBRM volumes to the recipient's place of business;
- (g) the method customarily used to sort such recipient's QBRM to the recipient and the processing step (e.g. incoming primary, incoming secondary) and the location where the final sort to that recipient occurs (e.g. at another postal facility, outside the postage due unit in the destination facility, or within the postage due unit in the destination facility); and
- (h) if the QBRM recipient received BRM at such facility in 1989, please furnish the information requested in part (g) for 1989.

Please note that you are not being requested to identify individual QBRM recipients. If the annual volume received by any of the high volume QBRM recipients you identify is less than 113,333 pieces, please so indicate and do not furnish the information requested in parts (a), (c)-(h).

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, 26, and 27 of the Commission's Rules of Practice.

Dated this 21th day of March 2000.


Michael W. Hall

Michael W. Hall