

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


**Second Set Of Interrogatories And Document Production Requests  
Of KeySpan Energy To USPS Witness Linda A. Kingsley**

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 Linda A. Kingsley: **KE/USPS-T10-5**. 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  
March 21, 2000

**Second Set Of Interrogatories And Document Production Requests  
Of KeySpan Energy To USPS Witness Linda A. Kingsley**

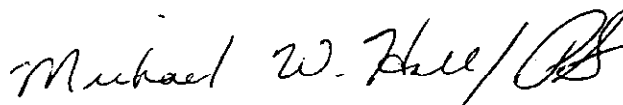
**KE/USPS-T10-5** Please refer to your response to Interrogatory KE/USPS-T10-1, where you indicate that the Advanced Facer Canceler System (AFCS) does not cull out heavy letter-sized mail.

- (a) Please explain whether or not the Postal Service culls out any letter-sized mail pieces, based on weight, prior to processing that occurs in the Mail Preparation operation. If the Service does so, at what weight level are letter-sized pieces culled out and how is this task accomplished?
- (b) Please explain whether or not the Postal Service culls out any letter-sized pieces, based on weight, prior to processing that occurs in the Outgoing RBCS operation. If the Service does so, at what weight level are letter-sized pieces culled out and how is this task accomplished?
- (c) Please explain whether or not the Postal Service culls out any letter-sized pieces, based on weight, prior to processing that occurs in the Outgoing Primary Automation operation. If the Service does so, at what weight level are letter-sized pieces culled out and how is this task accomplished?
- (d) Please explain whether or not the Postal Service culls out any letter-sized pieces, based on weight, prior to processing that occurs in the Outgoing Primary Manual operation. If the Service does so, at what weight level are letter-sized pieces culled out and how is this task accomplished?

**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.

A handwritten signature in cursive script that reads "Michael W. Hall" followed by a stylized flourish.

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Michael W. Hall