

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

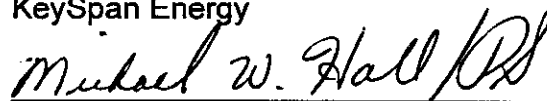
**Third Set Of Interrogatories And Document Production Requests  
Of KeySpan Energy To USPS Witness Linda A. Kingsley**

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-T10-6**. 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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Round Hill, Virginia 20141  
540-554-8880  
Counsel for  
KeySpan Energy

Dated: Round Hill, VA  
March 23, 2000

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

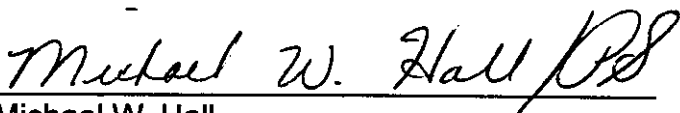
**KE/USPS-T10-6** On page 5 of your prepared testimony, you state that there are currently over 4,850 Delivery Bar Code Sorters (DBCS) in place and that, with addition of 270 more, deployment of this type of processing machine will be completed by September 2000. On page 6 of your prepared testimony you state that there are currently 1,369 Mail Processing Bar Code Sorters (MPBCS) in operation with no plans to deploy additional processing machines of this type.

- (a) Please provide a schedule showing, by year, the number of DBCSs deployed from the beginning of the DBCS program through September 2000.
- (b) Please provide a schedule that shows, by year, the number of MPBCSs deployed from the beginning of the MPBCS program through the date the final MPBCS was deployed.
- (c) Please provide an estimate of the percentage of First-Class letters that were sorted in the incoming secondary for each year included in your responses to parts (a) and (b) and the test year in this case.

**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 23rd day of March 2000.

  
Michael W. Hall  
Michael W. Hall