

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 KINGSLEY TO INTERROGATORY OF
KEYSPAN ENERGY
(KE/USPS-T10-6)

The United States Postal Service hereby provides the response of witness Kingsley to the following interrogatory of Keyspan Energy: KE/USPS-T10-6, filed on March 23, 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



Susan M. Duchek

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April 6, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF KEYSpan ENERGY**

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.

Response:

- a) Please see USPS-LR-I-271 for deployment schedules for DBCS machines Phase 1 – 5, and the DBCS/OSS II schedule. Phase 1 consisted of 714 Siemens DBCS machines as well as 614 Martin Marietta DBCS machines. These Marietta systems were, however, replaced by the DBCS Phase 5 deployment last year and are no longer in service.
- b) I am told that the original deployment schedule of the MPBCS was over 10 years ago and those records not available.
- c) Generally, we do not track operations by class. Of the barcoded letter volumes, the following are the percentages of letters finalized on automation for incoming secondary operations for which actual figures were available:

FY 95 – 78%

FY 99 – 93% (See testimony page 8)

The projected figure for the percentage of letters finalized on automation for FY 2001 is 94.1%. (See DMA/USPS-T10-9)

DECLARATION

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

Linda A. Kingsley
Date: 4-6-2000

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.

A handwritten signature in black ink, appearing to read "Susan M. Duchek", is written over a horizontal line.

Susan M. Duchek

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