

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 THE UNITED STATES POSTAL SERVICE
TO KEYSpan ENERGY MOTION TO COMPEL
(April 19, 2000)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby files this response to the April 12, 2000, motion of KeySpan Energy seeking to compel responses to subparts (g) and (h) of KE/USPS-T33-3. For the reasons stated below, the motion should be denied or otherwise deemed moot.

The Postal Service hereby withdraws its objection to the interrogatories, filed on March 31, 2000. The questions, as with other subparts of KE/USPS-T33-3, delve into matters beyond the scope of witness Fronk's testimony or the testimony of any other postal witness. They ask for an explanation of the Governors decision in Docket No. R97-1 and, by implication, the Commission's recommended decision. Accordingly, these questions are considered appropriate for redirection from witness Fronk to the institution for response. Responses have been filed today. The Postal Service assumes that the provision of those responses renders the controversy moot.

Given the nature of the questions and the responses, it is unclear whether KeySpan still considers that the Postal Service should be required to provide a witness to appear for cross-examination on these responses. Depending on the questions it might seek to ask, KeySpan is free to determine whether any of the Postal Service's designated witnesses can respond, when the time comes to cross-examine them.

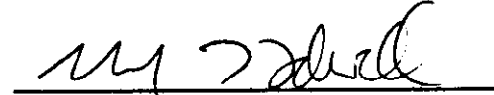
However, the Postal Service objects to the notion that KeySpan can simply name a topic, declare that it has (unknown) questions about that topic, and demand that someone other than designated witnesses answer them via cross-examination.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

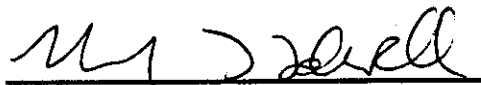


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April 19, 2000

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.



Michael T. Tidwell

April 19, 2000