

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

Docket No. R2000-1

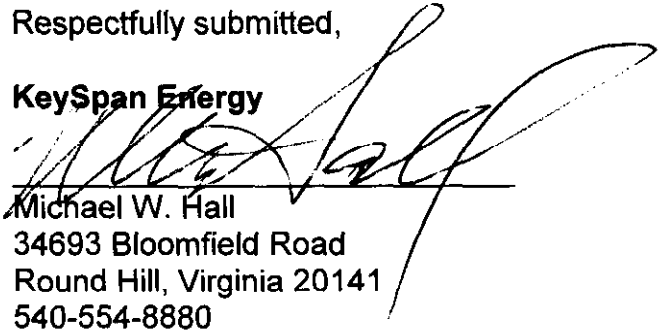
**KeySpan Energy's
Follow Up Interrogatories And Document Production Requests
To USPS Witness Chris F. Campbell**

Pursuant to Rules 25, 26, and 27 of the Commission's Rules of Practice, KeySpan Energy submits the following follow up interrogatories and document production requests to United States Postal Service witness Chris F. Campbell: **KE/USPS-T29-53**. 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
April 25, 2000

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 25th day of April 2000.


Michael W. Hall

**Keyspan Energy's
Follow Up Interrogatories And Document Production Requests
To USPS Witness Chris F. Campbell**

KE/USPS-T29-53 Please refer to your latest revised response to Interrogatory **KE/USPS-T29-49** (dated April 24, 2000) and USPS witness Susan W. Mayo's response to Interrogatory **KE/USPS-T39-12 (d) and (f)**. In your response to Interrogatory **KE/USPS-T29-49, parts (a) and (b)**, you furnished certain limited information about the top (i.e. highest volume) 75 QBRM accounts using the database and search capabilities available through the PERMIT system. In her response to Interrogatory **KE/USPS-T39-12 (d)**, witness Mayo indicated that, according to a centralized Postal Service database known as the Corporate Business Customer Information System ("CBCIS"), "at least 486 BRM mailers [sic] have reported annual volumes for one ounce pieces exceeding the breakeven volume that would make the proposed QBRM with the quarterly fee attractive."

- a. Please list, compare, and contrast the QBRM recipient information that is contained in the PERMIT and CBCIS databases.
- b. Please explain fully the purposes for which the Postal Service uses the PERMIT and CBCIS systems.
- c. Please state the date that the PERMIT system came online.
- d. Please state the date that the CBCIS system came online.
- e. To the extent not already furnished and fully explained in connection with the above parts of this interrogatory, please state and explain what information about QBRM recipients, if any, is contained in the PERMIT system but not the CBCIS system or in the CBCIS system but not the PERMIT system.
- f. Using whichever database system is more comprehensive (i.e. contains information about the greatest number of QBRM recipients), please provide, for the base year and the most recent twelve month period for which data are available, a list of all QBRM recipients who received more QBRM reply mail pieces than the breakeven volume of 113,000 pieces per year ("high volume QBRM recipients"). For each of the high volume QBRM recipients, please provide, in tabular form, the following information from the PERMIT or CBCIS database, if available, or other sources if the referenced databases do not include the requested information:
 - (1) the location of the postal facility where such QBRM recipient receives its reply mail;

- (2) the total volumes of QBRM received during the relevant twelve month period;
 - (3) how many different addresses the QBRM recipient maintains for QBRM at such postal facility;
 - (4) if a listed QBRM recipient maintains more than one QBRM address at that facility, the volumes of QBRM delivered to each of the recipient's addresses during the relevant periods;
 - (5) if a listed account holder receives QBRM reply mail pieces for others, the number of different QBRM recipients for which the listed recipient receives such reply mail pieces;
 - (6) whether the address printed on each of the QBRM recipient's reply piece is a post office box or a physical street address;
 - (7) 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;
 - (8) 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
 - (9) if the QBRM recipient received BRM at such facility in 1989, please furnish the information requested in subpart (8) for 1989.
- g. For customer 2 at Postal Facility 17, for which you show total volumes of 30,017,809 and 38,382,839 pieces on Attachments 1 and 2, respectively, to your response to Interrogatory KE/USPS-T29-49:
- (1) Please confirm that customer 2 receives QBRM reply mail pieces on behalf of many other QBRM recipients and state how many.
 - (2) Please state how these pieces (i) sorted in the last sort when the pieces are separated to the recipient, and (ii) counted.
- h. For each of the Post Offices included in Attachment 1 and/or 2 of your response to Interrogatory KE/USPS-T29-49, please state and identify by

geographic location, which ones were included in study performed by USPS witness Pham in Docket No. R90-1 (USPS-T-23).

- i. For the periods for which you furnish information in response to this interrogatory, please provide the total volumes of QBRM reported in the PERMIT system, the CBCIS system, and the RPW system.