

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

**KeySpan Energy's Request For Postal Service Witness To Explain Institutional Responses Designated As Written Cross-Examination**

Pursuant to Presiding Officer's Ruling No. R2000-1/40, issued April 17, 2000, KeySpan Energy ("KeySpan") requests the appearance on May 11, 2000 of one or more Postal Service witnesses who can explain the following institutional responses to interrogatories propounded by KeySpan and designated as written cross-examination by notice dated May 3, 2000: KE/USPS-T29-10 (d), KE/USPS-T29-21, KE/USPS-T29-43. KeySpan also needs explanations for responses we expect the Postal Service to file shortly in response to Interrogatory KE/USPS-T29-53.

KeySpan further advises the Presiding Officer and Commission that portions of the expected responses to Interrogatory KE/USPS-T29-53 will be furnished subject to protective conditions and *in camera* or other appropriate procedures may be required to protect the confidentiality of such information during cross-examination.

Respectfully submitted,

KeySpan Energy

By: 

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Counsel for  
KeySpan Energy

Dated: Round Hill, VA  
May 8, 2000

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document 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 (b) of the Commission's Rules of Practice.

Dated this 8th day of May 2000.

  
Michael W. Hall