

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. R2001-1

**KeySpan Energy's First Set Of Interrogatories And Document Production  
Requests To USPS Thomas A. Bozzo**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice,  
KeySpan Energy submits the following interrogatories and document production  
requests to USPS witness **Thomas A. Bozzo: MMA/ USPS-T14-1-8**. 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  
November 5, 2001

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing discovery request upon  
the United States Postal Service, the Designated Officer of the Commission, and  
participants who requested service of all discovery documents, in compliance  
with the Commission's Rules of Practice.

Dated this 5th day of November 2001.

  
Michael W. Hall

**KeySpan Energy's First Set Of Interrogatories And Document Production  
Requests For USPS Witness Thomas A. Bozzo**

**MMA/ USPS-T14-1** Please refer to Library Reference USPS-LR-J-56 where you develop accept rates and productivities for the outgoing BCS primary operation.

- A. Please refer to page 52 of Library Reference USPS-LR-J-60. Please confirm that, according to USPS witness Miller, 5.35% of all letters sent to the outgoing BCS primary are barcoded by the Postal Service in the RBCS, and that the remaining letters sent to that operation, 94.65%, have been prebarcoded by mailers. If you cannot confirm, please explain.
- B. Please confirm that the accept rate for the outgoing BCS primary operation is 95.1%. If you cannot confirm, please explain.
- C. Please provide all of the reasons that can cause the BCS primary operation to reject 4.9% of the pieces.
- D. Will pre-approved prebarcoded QBRM and CRM letters that were included in outgoing First-Class Automation letters be more or less likely to be rejected than CEM letters that are not pre-approved? Please explain your answer.
- E. Will pre-approved prebarcoded QBRM and CRM letters that were included in outgoing First-Class Automation letters, be more or less likely to be rejected than letters that were barcoded by the Postal Service in the RBCS? Please explain your answer

**MMA/ USPS-T-14-2** Please refer to Library Reference USPS-LR-J-56 where you develop accept rates and productivities for the outgoing BCS secondary operation.

- A. Please confirm that the accept rate for an outgoing BCS secondary operation is 96.0%. If you cannot confirm, please explain.
- B. Please provide all of the reasons that cause the outgoing BCS secondary operation to reject 4.0% of the pieces.
- C. Will pre-approved prebarcoded QBRM and CRM letters that were included in outgoing First-Class Automation letters be less likely to be rejected than CEM letters that are not pre-approved? Please explain your answer.
- D. Will pre-approved prebarcoded QBRM and CRM letters that were included in outgoing First-Class Automation letters be more or less likely to be

rejected than letters that were barcoded by the Postal Service in the RBCS? Please explain your answer.

**MMA/ USPS-T-14-3** Please refer to Library Reference USPS-LR-J-56 where you develop accept rates and productivities for the incoming BCS MMP operation.

- A. Please confirm that the accept rate for an incoming BCS MMP operation is 96.0%. If you cannot confirm, please explain.
- B. Please provide all of the reasons that cause the incoming BCS MMP operation to reject 4.0% of the pieces.
- C. Will pre-approved prebarcoded QBRM and CRM letters that were included in outgoing First-Class Automation letters be more or less likely to be rejected than CEM letters that are not pre-approved? Please explain your answer.
- D. Will pre-approved prebarcoded QBRM and CRM letters that were included in outgoing First-Class Automation letters be more or less likely to be rejected than letters that were barcoded by the Postal Service in the RBCS operation? Please explain your answer.

**MMA/ USPS-T-14-4** Please refer to Library Reference USPS-LR-J-56 where you develop accept rates and productivities for the incoming BCS SCF/primary operation.

- A. Please confirm that the accept rate for an incoming BCS SCF/primary operation is 96.0%. If you cannot confirm, please explain.
- B. Please provide all of the reasons that cause the incoming BCS SCF/primary operation to reject 4.0% of the pieces.
- C. Will pre-approved prebarcoded QBRM and CRM letters that were included in outgoing First-Class Automation letters be more or less likely to be rejected than CEM for which there has been no pre-approval? Please explain your answer.
- D. Will pre-approved prebarcoded QBRM and CRM letters that were included in outgoing First-Class Automation letters be more or less likely to be rejected than letters that were barcoded by the Postal Service in the RBCS operation? Please explain your answer.

**MMA/ USPS-T-14-5** Please rank the following types of letters according to the relative difficulty that postal automation equipment has in processing the type

of letter and the likelihood that such letters will be rejected. Please give the reasons for the rankings provided in your answer.

- A. Handwritten addressed letters;
- B. Machine printed addressed letters;
- C. Prebarcoded machine printed addressed letters that have not been pre-approved by Postal Service officials; and
- D. Prebarcoded machine printed addressed letters that are pre-approved by Postal Service officials.

**MMA/ USPS-T-14-6** Please refer to pages 12 and 14 of Library Reference USPS-LR-J-60.

- A. Please confirm that according to USPS witness Miller, 7.61% of handwritten letters (761 of 10,000 letters) will be rejected by postal automation equipment at some point during processing and processed manually from that point on. If you cannot confirm, please explain.
- B. Please confirm that according to USPS witness Miller, 10.52% of QBRM letters (1,052 of 10,000 letters) will be rejected by postal automation equipment at some point during processing and processed manually. If you cannot confirm, please explain.
- C. Is it reasonable to expect that 7.61 % of handwritten addressed letters would be rejected by postal automation equipment, but if those same letters have prebarcodes and printed addresses that are pre-approved pursuant to USPS requirements, that 10.52% of such letters would be rejected? Please explain your answer.

**MMA/ USPS-T-14-7** Please refer to pages 14 and 16 of Library Reference USPS-LR-J-60.

- A. Please confirm that, according to USPS witness Miller, 4.51 percent of metered letters (451 of 10,000 letters) will be rejected by postal automation equipment at some point during processing (excluding the incoming secondary operation) and processed manually. If you cannot confirm, please explain.
- B. Please confirm that, according to USPS witness Miller, 10.52 percent of QBRM letters (1,052 of 10,000 letters) will be rejected by postal automation equipment at some point during processing and processed manually. If you cannot confirm, please explain.

- C. Is it reasonable to expect that 4.49 % of metered letters would be rejected by postal automation equipment, but 10.52% of prebarcoded letters with printed addresses that were pre-approved pursuant to USPS requirements would be rejected? Please explain your answer.

**MMA/ USPS-T-14-8** Please refer to pages 12 and 14 of Library Reference USPS-LR-J-60 where Mr. Miller presents his mail flow models for handwritten and QBRM letters.

- A. Please confirm that of 10,000 handwritten letters sent to the outgoing RBCS, Mr. Miller finds that 9,891 letters will be successfully barcoded and sorted and that such letters will next be sent to an automated operation for additional processing; and the remaining 109 letters will be sent to a manual operation for additional processing. If no, please explain.
- B. B. Please confirm that of 10,000 QBRM letters sent to the outgoing BCS primary, Mr. Miller finds that 9,510 letters will be successfully sorted and that such letters will next be sent to an automated operation for additional processing; and the remaining 490 letters will be sent to a manual operation for additional processing. If no, please explain.
- C. Is it reasonable for the RBCS to "reject" 1.09% of handwritten letters but for a barcode sorted to reject 4.9% of pre-approved, prebarcoded QBRM letters? Please explain your answer.