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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES **Docket No. R2001-1**

KeySpan Energy's First Set Of Interrogatories And Document Production Requests To USPS Witness Linda A. Kingsley

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, KeySpan Energy herewith submits the following interrogatories and document production requests to USPS witness Linda A. Kingsley: **KE/USPS-T39-1-14**. 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 To USPS Witness Linda A. Kingsley

KE/USPS-T39-1 On page 11 of your Direct Testimony you claim that firm holdout or post office box addressed letters that have a unique 9-digit zip code require two passes in the sector/segment operation as part of the incoming secondary sort.

A. Please describe the flow of QBRM letters from the time they reach the 010 mail preparation operation until they reach the firm holdout or post office box.

B. Please describe the flow of these same letters if the addresses were hand addressed, there was no prebarcode, and the requirement for pre-approval of mail design by the Postal Service was waived.

KE/USPS-T39-2 In Docket No. R2000-1, you were asked about the processing of letters addressed to a postal customer that had its own, unique 11-digit zip code. Please see your answers to Interrogatories KE-USPTS-T10-3 and 4.

A. Please confirm that you testified that if such an addressee were to receive on average 5,000 pieces per day, the final separation for that recipient would "very likely" take place in the incoming secondary operation. If you cannot confirm, please explain. If your answer is not the same today, please explain why not and provide copies of any studies or other documents you rely upon.

B. Please confirm that you testified that the minimum received by that addressee could be as little as 1,000 pieces per day in order for the final separation to take place in the incoming secondary operation. If you cannot confirm, please explain. . If your answer is not the same today, please explain why not and provide copies of any studies or other documents you rely upon.

C. Please confirm that you testified that if such an addressee were to receive on average 5,000 pieces per day, the final separation for that recipient would "not likely" take place in the incoming primary operation. If you cannot confirm, please explain. If your answer is not the same today, please explain why not and provide copies of any studies or other documents you rely upon.

D. Please confirm that you testified that the minimum received by that addressee would generally have to be 20,000 pieces per day in order for the final separation to take place in the incoming primary operation. If you cannot confirm, please explain. If your answer is not the same today, please explain.

E. Would your answers for Parts A though D be the same if the letters were addressed to a post office box. If no, please explain.

F. Would your answer for parts A through D be the same if the letters were QBRM with a unique 9-digit zip code? If no, please explain.

KE/USPS-T39-3 Please refer to your response to Interrogatory KE/USPS-T10-6c in Docket No. R2000-1 where you testified that the Postal Service expected to finalize by automation 94.1% of all barcoded letter volume in the incoming secondary operation by the test year in that case.

A. Was this goal achieved? Please support your answer.

B. What is the projection for the test year in this case?

C. Does your projection include letters addressed to a post office box? Please explain.

KE/USPS-T39-4 When pre-approved prebarcoded letters (such as QBRM or CRM included in outgoing First-Class Automation letters) are rejected from an outgoing BCS operation, are they then sorted in the manual mailstream until delivery, or are they sent through the RBCS or some other OCR to see if they can be barcoded by the Postal Service. Please explain your answer.

Q. **KE/USPS-T39-5** Please explain how the Postal Service processes the following types of letters after they have been rejected from an outgoing OCR in an ISS operation?

A. Handwritten addressed letters; and

B. Machine printed addressed letters.

KE/USPS-T39-6 On page 11 of your Direct Testimony you note that as recently as AP12, FY01, the amount of barcoded letters within the Postal mailstream has grown to 91.1%. You also indicate that of that total, 28% were barcoded by the Postal Service.

A. Does the 91.1% refer to all First-Class letters or all letters, including First Class, Periodicals and Standard Mail?

B. Please provide the underlying volumes from which you computed these percentages.

C. Of those letters barcoded by the Postal Service in AP12, FY01, were such letters barcoded within the RBCS system? If not, please explain how such letters were barcoded.

D. In AP12, FY01, what percent of the total First-Class letters barcoded by the Postal Service were barcoded by (1) the RCR system and (2) the REC system.

E. For the test year in this case, please indicate the percentage of total First-Class non-prebarcoded letters that the Postal Service expects to barcode.

F. For the test year in this case, please indicate the percentage of total First-Class non-prebarcoded letters that the Postal Service expects to barcode by (1) the RCR system and (2) the REC system.

KE/USPS-T39-7 Please fill in the table below to the extent possible for the test year or for the latest period for which actual data are available. Please provide the source and support for your volume figures.

First-Class Single Piece Letter-Shape Mail Volume Projections

Type of Address	BRM	Metered	Stamped	Total
Prebarcoded				
Machine Printed				
Handwritten				
Total				

KE/USPS-T39-8 Please fill in the table below to the extent possible for the test year or for the latest period for which actual data are available. Please provide the source and support for your volume figures.

First-Class Single Piece Letter-Shape Mail Volume Projections

Type of Address	Machinable	Nonmachinable	Total
Prebarcoded			
Machine Printed			
Handwritten			
Total			

KE/USPS-T39-9 Please fill in the table below to the extent possible for the test year or for the latest period for which data are available. Please provide the source and support for your volume figures.

First-Class Single Piece Letter-Shape Mail Volumes
Processed by Automation and Manually

Type of Address	Processed by Automation Exclusively	Processed Manually in at Least one Operation	Total
Prebarcoded			
Machine Printed			
Handwritten			
Total			

KE/USPS-T39-10 Please fill in the table below to the extent possible for the test year and for the latest period for which data are available. Please provide the source and support for your volume figures.

First-Class Single Piece Letter-Shape Mail Volume
Projections

Type indicia	Machinable	Nonmachinable	Total
BRM			
Metered			
Stamped			
Total			

KE/USPS-T39-11 Please fill in the table below to the extent possible for the test year and for the latest period for which data are available. Please provide the source and support for your volume figures.

First-Class Single Piece Letter-Shape Mail Volumes
Processed by Automation and Manually

Type of Indicia	Processed by Automation Exclusively	Processed Manually in at Least one Operation	Total
BRM			
Metered			
Stamped			
Total			

KE/USPS-T39-12 Please fill in the table below to the extent possible for the test year or for the latest available period. Please provide the source and support for your volume figures.

First-Class Single Piece Letter-Shape Mail Volumes
Processed by Automation and Manually

Type of Letter	Processed by Automation Exclusively	Processed Manually in at Least one Operation	Total
Machinable			
Non-machinable			
Total			

KE/USPS-T39-13 Please refer to the Postal Service's response to Interrogatory OCA/USPS-62.

A. Please confirm that the Postal Service barcoded 3,007,541,000 letters during AP 12, FY 01. If no, please explain

B. Please confirm that the Postal Service failed to barcode 946,754,000 letters during AP 12, FY 01. If no, please explain

C. Please confirm that the Postal Service could potentially have barcoded 3,007,541,000 plus 946,754,000 letters or 3,954,295,000 during AP 12, FY 01. If no, please explain.

D. Please confirm that the Postal Service could not or did not barcode 946,754,000 / 3,954,295,000 or 23.9 % of the letters during AP 12, FY 01. If no, please explain.

E. For the test year, what percent of total letters will the Postal Service fail to barcode, given the fact that 23.9 % of the letters were not barcoded during AP 12, FY 01? Please support your answer.

F. Please fill in the following table and correct any volume figures shown if they are not correct.

Volume of Barcoded and Non-barcoded Letters (000)

Subclass	Letters with USPS Applied Barcodes	Letters with Mailer Applied Barcodes	Letters Without Barcodes
FY 1999			
First Class			9,829,438
Standard			7,373,399
Total			17,202,837
FY 2000			
First Class			9,105,107
Standard			6,765,283
Total			15,870,390
FY 2001			
First Class			8,467,994
Standard			5,699,796
Total			14,167,790
AP 12, FY 01			
First Class			567,350
Standard			379,404
Total	3,007,541	6,649,493	946,754
AP 13, FY 01			
First Class			545,863
Standard			363,027
Total			908,890

KE/USPS-T39-14 Please refer to your descriptions of the equipment used in the RBCS on pages 5 and 6 of your Direct Testimony, the mail flow densities provided on pages 46 and 52 of Library Reference USPS-LR-J-60, and USPS witness Campbell's answer to Interrogatory KE/USPS-T29-50(F) in Docket No. R2000-1.

A. Please confirm that MLOCRs (44 or 60 bins) that are currently used in the outgoing ISS operation provide for fewer separations than MPBCSs (96 bins) and DBCSs (174 bins, on average). If no, please explain.

B. Please confirm that USPS witness Miller shows that 26.36% of the letters processed in the outgoing ISS operation can be sorted such that the letters bypass the outgoing secondary and incoming primary operations, and go directly to the incoming secondary. If no, please explain.

C. Please confirm that USPS witness Miller shows that 6.59% of the letters processed in the outgoing BCS primary can be sorted such that the letters bypass the outgoing secondary and incoming primary operations, and go directly to the incoming secondary. If no, please explain.

D. Why would the letters processed in the outgoing ISS operation be sorted to a finer degree than letters processed in a BCS outgoing primary operation?

E. Please confirm that USPS witness Miller shows that 34.00% of the letters processed in the outgoing OSS operation can be sorted such that the letters bypass the outgoing secondary and incoming primary operations, and go directly to the incoming secondary. If no, please explain.

F. Why would the letters processed in the outgoing OSS operation be sorted to a finer degree than letters processed in the BCS outgoing primary operation?

G. Please confirm that USPS witness Millers shows that the marginal productivities for the outgoing ISS, outgoing OSS and outgoing BCS primary operations are 8,142, 10,240, and 6,559, respectively. If no, please explain.

H. Why would the letters processed in the outgoing ISS and OSS operations be sorted to a finer degree and with much greater productivity than letters processed in the BCS outgoing primary operation?