

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

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POSTAL RATE COMMISSION
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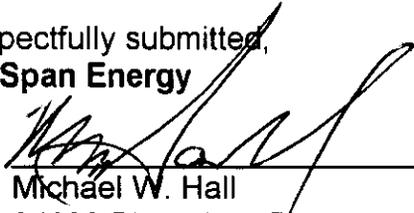
POSTAL RATE AND FEE CHANGES

Docket No. R2001-1

**KeySpan Energy's Second 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 submits the following interrogatories and document production requests to USPS witness Linda A. Kingsley: **KE/USPS-T39-15-16**. 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

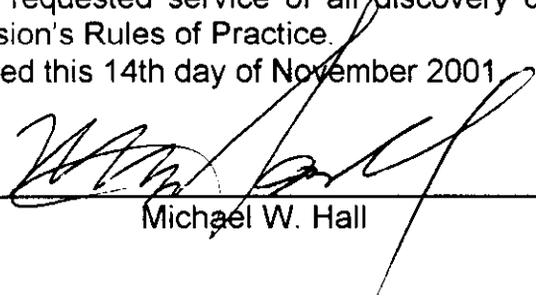
Counsel for
KeySpan Energy

Dated: Round Hill, VA
November 14, 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 14th day of November 2001


Michael W. Hall

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

KE/USPS-T29-15 Please refer to the table that you were asked to complete in response to Part F of Interrogatory KE/USPS-T29-13.

A. Please provide the projected test year after rates volumes and percentages by filling in the following table.

Subclass	Letters with USPS Applied Barcodes	Letters with Mailer Applied Barcodes	Letters Without Barcodes	Total Letters
TY 2003				
First Class Standard Total				
First Class				100%
Standard				100%
Total				100%

B. Please provide a full explanation as to why the Postal Service will not barcode the volume and percentage of First-Class letters that you indicate will not be barcoded in the test year. In your explanation, please indicate during what processing operation (i.e., AFCA, outgoing ISS, outgoing OSS, outgoing BCS primary etc.) the Postal Service determines that such letters cannot be barcoded.

KE/USPS-T39-16 Please refer to your response to Part G of Interrogatory MMA/USPS-T39-4. There you provided the volumes resolved by RCR and REC during FY 2001. Please fill in the following table, making corrections if necessary.

**First-Class Letters Barcoded in FY 2001 and TY 2003
(000)**

First-Class Single Piece	RCR Resolved	REC Resolved	Prebarcoded	Not Barcoded	Total Volume
FY 2001	15,316,444	8,343,459			
Projected TY 2003					47,899,389