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

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

KeySpan Energy's Second Set Of Interrogatories And Document Production Requests To USPS Witness Michael W. Miller

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 **Michael W. Miller**: **KE/USPS-T22-20-21.** 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: _____

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Counsel for

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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.

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Michael W. Hall

KeySpan Second Set Of Interrogatories And Document Production Requests For USPS Witness Michael W. Miller

KE/USPS-T22-20 Please refer to revised Library Reference USPS-LR-J-60 where you altered the models for Handwritten (HAND) and QBRM letters to exclude all operations after the outgoing primary, and to your responses to Parts K and L of Interrogatory MMA/USPS-T22-25.

A. Please confirm that out of 10,000 HAND letters, you assume that 9,891 or 98.9% of the letters will be successfully barcoded in the Outgoing RBCS operation. If no, please correct these figures, provide the source for your corrected figures, and explain why each such correction is necessary.

B. Please confirm that out of 10,000 HAND letters, you assume that 9,891 or 98.9% of the letters will be successfully sorted in the Outgoing RBCS operation. If no, please explain.

C. Please confirm that out of 10,000 HAND letters, you assume that 109 (89 from the ISS and 20 from the OSS) or 1.09% of the letters will be rejected from the outgoing RBCS and will be sent to a manual operation afterwards. If no, please correct these figures, provide the source for your corrected figures, and explain why each such correction is necessary.

D. Please explain all possible differences between the equipment used in the outgoing primary BCS operation for QBRM letters and the following RBCS automated equipment used to process HAND letters that causes the reject rates for HAND letters to be so much lower than those for QBRM letters.

1. The ISS which has a leakage rate of .89%, and
2. The OSS which has a reject rate of .20%.

E. Please explain the term "leakage rate" and how it differs from "reject rate".

F. Please confirm that out of 10,000 QBRM letters, you assume that 9,510 or 95.10% of the letters will be successfully *sorted* in the Outgoing BCS Primary operation. If no, please correct these figures, provide the source for your corrected figures, and explain why each such correction is necessary.

G. Please confirm that after the outgoing primary operation, you assume that the processing of HAND and QBRM letters will incur similar costs until final delivery. If no, please explain.

H. Please confirm that the percentages you confirm (or correct) in parts A through C and F are not figures specific to handwritten or QBRM letters, but are "results" of using "average" data in the models. If you cannot confirm please explain.

I. Please explain why the percentage of letters successfully sorted by automation in the outgoing primary operation that "result" from using "average" data in the models are not specific to the category of letters that the model is intended to reflect.

J. Please explain how you can accurately determine the cost relationships between the rate categories if the percentage of letters successfully sorted by automation in the outgoing primary operation that "result" from using "average" data in the models are not specific to the category of letters that the model is intended to reflect.

K. Is it your testimony that the cost distinctions that exist between a QBRM mail piece and a handwritten reply mail piece disappear once the handwritten letter has been barcoded and sorted in the RBCS operation? Please explain your answer.

KE/USPS-T22-21 Please refer to page 6 of the USPS Address Deficiency Study, Library Reference USPS-LR-I-192 in Docket No. R2000-1 and your responses to Parts K and L of Interrogatory MMA/USPS-T22-25.

A. Please confirm that the USPS Address Deficiency Study found that 29.6% of all First-Class letters exhibited one or more address deficiencies. If you cannot confirm, please explain.

B. Do you agree that, because First-Class Automation letters have their addresses certified using the CASS system while single piece letters do not have their addresses certified, the percentage of First-Class single piece letters that have one or more address deficiencies is likely to be higher than 29.6%. Please explain your answer.

C. Please confirm that address deficiencies studied in the USPS Address Deficiency Study included:

1. Apartment Number
2. Directional Suffix
3. Rural Route/Box Number
4. Street Name/Number
5. City/State/Zip
6. Incorrect Zip+4

D. Please confirm that for purposes of your mail flow models, you assumed that HAND letters would exhibit no address deficiencies. If you cannot confirm, please explain.

E. In your response to Parts (K) and (L) of Interrogatory MMA/USPS-T22-25, you state that the primary cost distinctions that exist between QBRM and HAND letters are the costs required to apply a barcode in the RBCS

operation to the HAND letter. Please provide all of the other secondary cost distinctions that you know of, if they exist.