

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES

Docket No. R2001-1

**KeySpan Energy's Third 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-T22-22.** 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

KeySpan Energy

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 19th day of November 2001.


Michael W. Hall

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

KE/USPS-T22-22 Please refer to page 39 of your Direct Testimony where you indicate that the productivity for "riffing" letters was used as a proxy for manual counting.

- A. Please briefly describe the "riffing" operation (MODS operation 029).
- B. Please describe and explain all the reasons that postal clerks "riffle" through trayed mail letters.
- C. What is the manual sorting productivity that you referred to at that point in your Direct Testimony and what MODS operation covers such activity.
- D. Please describe the specific activities and operations entailed in searching for mis-sorts. Please be sure to indicate whether the trays in which postal clerks are sorting for mis-sorts are addressed to one recipient or numerous recipients.
- E. Please describe how the FY2000 "riffing" productivity of 2,134 pieces per hour was adjusted by a volume variability factor to arrive at the productivity used in your cost model.
- F. Please explain why you did not simply perform a study, similar to the one you performed for counting by weighing techniques, in order to obtain directly the productivity for counting letters.
- G. Please explain why you believe your estimate for counting letters is more accurate than the KeySpan study presented in Docket No. R00-1, which resulted in a higher productivity of 2,746 pieces per hour.