

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

RECEIVED

Nov 19 4 20 PM '01

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS BOZZO TO INTERROGATORIES OF KEYSpan ENERGY
(KS/USPS-T14-1(b), 2(a), 3(a), and 4(a))

The United States Postal Service hereby provides the responses of witness Bozzo to the following interrogatories of KeySpan Energy: KS/USPS-T14-1(b), 2(a), 3(a), and 4(a), filed on November 5, 2001. Interrogatories KS/USPS-T14-1(a) and 6-8 were redirected from witness Bozzo to witness Miller. Interrogatories KS/USPS-T14-1(c-e), 2(b-d), 3(b-d), 4(b-d) and 5 were redirected from witness Bozzo to witness Kingsley.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Frank R. Heselton

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-4823; Fax -5402
November 19, 2001

Response of United States Postal Service Witness Bozzo
To Interrogatories of KeySpan Energy

KE/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

KE/USPS-T14-1 Response.

- a. Redirected to witness Miller (USPS-T-22).
- b. Confirmed that the TPH/TPF ratio for outgoing primary BCS is 0.951, which implies that for those operations, rejected pieces constitute 4.9 percent of pieces fed.
- c.-e. Redirected to witness Kingsley (USPS-T-39).

KE/ 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.

KE/USPS-T14-2 Response.

- a. Confirmed that the TPH/TPF ratio for outgoing secondary BCS is 0.96, which implies that for those operations, rejected pieces constitute 4 percent of pieces fed.
- b.-d. Redirected to witness Kingsley (USPS-T-39).

KE/ 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.

KE/USPS-T14-3 Response.

- a. Confirmed that the TPH/TPF ratio for incoming MMP BCS operations is 0.96, which implies that for those operations, rejected pieces constitute 4 percent of pieces fed.
- b.-d. Redirected to witness Kingsley (USPS-T-39).

KE/ 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.

KE/USPS-T14-4 Response.

- a. Confirmed that the TPH/TPF ratio for incoming SCF/primary BCS operations is 0.96, which implies that for those operations, rejected pieces constitute 4 percent of pieces fed.
- b.-d. Redirected to witness Kingsley (USPS-T-39).

DECLARATION

I, A. Thomas Bozzo, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A. Thomas Bozzo

Dated: November 19, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Frank R. Heselton

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
November 19, 2001