

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS KINGSLEY TO INTERROGATORY OF KEYSPAN ENERGY REDIRECTED
FROM WITNESS BOZZO
(KE/USPS-T14-1(c)-(e))

The United States Postal Service hereby provides the response of witness Kingsley to the following interrogatory of Keyspan Energy redirected from witness Bozzo: KE/USPS-T14-1(c)-(e), filed on November 5, 2001.

The 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

Joseph K. Moore

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November 20, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS {name}
TO INTERROGATORIES OF {full party name}

KE/USPS-T-14-1 Please refer to Library Reference USPS-LR-J-56 where you develop accept rates and productivities for the outgoing BCS primary operation.

- 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

Response:

- C. Automation rejects are non-readable barcodes where there was no ID tag such as prebarcoded mail or a non-readable ID tag if barcoded by the Postal Service. A barcode can be non-readable because it was smeared, printed too lightly, too skewed, there was something in front of WABCR, or pieces overlapped during feeding inhibiting the WABCR's ability to see the entire barcode.
- D. I have no data nor personal experience on which to base an answer.
- E. It is my understanding that there is no data that differentiates letter automation read rates between postal applied and mailer applied barcodes.

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.

Joseph K. Moore

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