

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF KEYSpan ENERGY  
REDIRECTED FROM WITNESS MILLER  
(KE/USPS-T22-13, 17(J) AND 19)

The United States Postal Service hereby provides its responses to the following interrogatories of KeySpan Energy: KE/USPS-T22-13, 17(J) and 19, filed on November 5, 2001.

The interrogatories have been redirected to the Postal Service from witness Miller for response.

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

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Michael T. Tidwell

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November 21, 2001

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**KE/USPS-T22-13** What percent of QBRM letters are currently addressed to a post office box? Please provide the source for you answer.

**RESPONSE:**

The Postal Service does not have data responsive to this request.

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**KE/USPS-T22-17** Please refer to page 38 of your Direct Testimony where you discuss the downtime of BRMAS equipment when bills are printed out.

- J. Please provide copies of all technical manuals, training manuals and written policies and procedures that describe or prescribe the proper operation of BRMAS software and computer systems, the methods of connecting such systems to BCS equipment and any technical or other restrictions on the type of BCS equipment that BRMAS can be used with.

**RESPONSE:**

- (J) Please see USPS LR-J-183.

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**KE/USPS-T22-19** Please refer to pages 9466-67 of the transcript of hearings in Docket No. R2001-1 where USPS witness Campbell described plans to have a joint Postal Service/MTAC Working Group to study QBRM issues, “identify best practices throughout the field,” and report their findings by October 2001.

- A. Please provide a copy of the MTAC QBRM Working Group report if it exists. Please note that this a continuing request if the report has not yet been submitted.
  
- B. If the MTAC QBRM Working Group report has not been submitted yet or if it has been submitted but does not provide the following information, please indicate all dates on which the MTAC QBRM Working Group met, identify all persons who attended such meetings, identify which postal facilities the Working Group visited to observe QBRM processing and counting methods, and provide copies of the minutes of all such meetings and/or notes made by USPS attendees.

**RESPONSE:**

- (A) This report does not currently exist.
  
- (B) Please see USPS LR-J-184, which will be filed shortly.

## 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.

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