

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, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS BOZZO TO INTERROGATORY OF KEYSpan ENERGY
(KS/USPS-T14-9(d))

The United States Postal Service hereby provides the response of witness Bozzo to the following interrogatory of KeySpan Energy: KS/USPS-T14-9(d), filed on November 14, 2001. Interrogatories KS/USPS-T14-9(a-b) were redirected from witness Bozzo to witness Kingsley. Interrogatories KS/USPS-T14-9(c) and (e) were redirected from witness Bozzo to witness Miller.


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, Rate-making


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November 28, 2001

**Response of United States Postal Service Witness Bozzo
To Interrogatory of KeySpan Energy**

KE/ USPS-T-14-9 Please refer to page 12 of Library Reference USPS-LR-J-60 where Mr. Miller presents his mail flow models for handwritten letters, worksheet "table" of Library Reference USPS-LR-J-56, and to page 4 of USPS-T-39, the Direct Testimony of USPS witness Linda A. Kingsley.

- A. Please confirm that it is a national policy of the Postal Service to have the AFCS lift images only of script mail, which can then be later sent to the REC if the addresses cannot be resolved by the RCR. If you cannot confirm, please explain.
- B. Please confirm that letters whose address images have been lifted in the AFCS that cannot be resolved by the RCR will be sent to the OSS for barcoding and sorting. If you cannot confirm, please explain.
- C. Please confirm that USPS witness Miller shows that for every 10,000 handwritten single piece letters that enter the RBCS ISS operation, 1,714 letters are sent through the OSS. If you cannot confirm, please explain.
- D. Please confirm that in Library Reference USPS-LR-J-56, you show that 26.042 billion pieces were fed into the ISS while 27.495 billion pieces were fed into the OSS. If you cannot confirm, please explain.
- E. Are the number of letters fed into the ISS and OSS roughly even, as you show in USPS-LR-J-56, or is Mr. Miller correct in assuming that the number of pieces fed into the ISS is roughly 5+ times that of the pieces fed into the OSS? Please explain your answer.

Response:

- a. Redirected to Witness Kingsley.
- b. Redirected to Witness Kingsley.
- c. Redirected to Witness Miller.
- d. Confirmed that total pieces fed (TPF) for the outgoing ISS and outgoing OSS operations are, respectively, 26.042 billion and 27.495 billion.
- e. Redirected to Witness Miller.

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 28, 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

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