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

Nov 29 4 07 PM '01

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 Linda A. Kingsley**

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 Linda A. Kingsley: **KE/USPS-T39-17-20**. 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: 

Michael W. Hall
34693 Bloomfield Road
Round Hill, Virginia 20141
540-554-8880

Counsel for
KeySpan Energy

Dated: Round Hill, VA
November 29, 2001

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 29th day of November 2001.


Michael W. Hall

**KeySpan Energy's Third Set Of Interrogatories And Document Production
Requests To USPS Witness Linda A. Kingsley**

KE/USPS-T39-17 Please refer to your responses to Parts (C) and (F) of Interrogatory KE/USPS-T39-13. In Part C you indicate that in AP 12 of FY 01, 946,754,000 letters were not barcoded by the Postal Service, and that a portion of these letters was not barcoded because they were non-machinable. In Part F you indicate that in AP12 of FY 01, 946,754,000 letters were not barcoded, but that this total excluded non-machinable volumes.

- A. Does the 946,754,000 pieces not barcoded by the Postal Service in AP 12 of FY 01 include or exclude non-machinable letters?
- B. If your answer to Part A is that non-machinable letters are included, please indicate what portion of those 946,754,000 letters were not barcoded because the letters were non-machinable.
- C. Please provide the number of non-machinable letters for the base year in this case.
- D. Please provide the Postal Service's estimate of the number of non-machinable letters for (1) the test year before rates and (2) the test year after rates.

KE/USPS-T39-18 In his response to Part D of Interrogatory KE/USPS-T22-3, USPS witness Miller discusses "rejects" from the outgoing OSS and ISS where such letters are provided with a 5-digit barcode rather than a 9- or 11-digit barcode.

- A. In the base year what percentage of letters that are barcoded by the RBCS receive only a 5-digit barcode?
- B. For letters barcoded by the RBCS in the test year, what percentage of such letters is expected to receive only a 5-digit barcode?

KE/USPS-T39-19 Please refer to USPS witness Miller's response to Part A of Interrogatory KE/USPS-T22-4 where he states that he has no information regarding the impact that type of address, i.e., handwritten or machine addressed, has on how the Postal Service will process a letter, i.e. by automation or manually.

- A. Please confirm that there is no discernable relationship between the likelihood of the Postal Service barcoding a First-Class letter to 5-digits versus 9- or 11-digits, and the type of address, i.e. either handwritten or machine printed. If no, please explain.

- B. Please confirm that there is no discernable relationship between the likelihood of the Postal Service barcoding a First-Class letter, and the type of address, i.e. either handwritten or machine printed. If no, please explain.
- C. Please confirm that there is no discernable relationship between the likelihood of the Postal Service sorting a First-Class letter by automation and the type of address, i.e. either handwritten or machine printed. If no, please explain. If no, please explain.

KE/USPS-T39-20 Please refer to your response to Interrogatory KE/USPS-T39-16. There you were asked to fill in a table similar to the one below except that in the table below a row for base year information has been added. Your response failed to provide confirmation or correction of the specific numbers provided by KeySpan Energy and failed to provide, for FY 2001, the requested breakdown between Prebarcoded and Not Barcoded, as well as the Total Volume.

**First-Class Single Piece Letter-Shape Mail
(000)**

First-Class Single Piece	RCR Resolved	REC Resolved	Prebarcoded	Not Barcoded	Total Volume
BY 2000					47,033,105 ¹
FY 2001	15,316,444 ²	8,343,459 ³			
Projected TY 2003					43,017,298 ⁴

¹ USPS-LR-J-53

² Response to OCA/USPS-159(C)

³ Response to KE/USPS-T39-6 (D)

⁴ USPS-LR-J-58

Please fill in **all** of the blanks, including your best estimate of the number of letters prebarcoded and not barcoded. If the numbers KeySpan Energy has provided are wrong, please correct them. Please fill in the Total Volume of letter-shaped pieces, since the Postal Service is the only party who can provide that data. If the BY 2000 RCR and REC resolved volumes are not available, please so state. Finally, for the test year please fill in the projections. If no projections have been made, please explain why those projections have not been made. If you have assumed that the same relationship exhibited during BY 2000 and/or FY 2001 can be expected to be maintained through the test year, please explain the bases for such assumption.