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

Nov 29 4 05 PM '01

POSTAL RATE COMMISSION  
OFFICE OF THE CLERK

POSTAL RATE AND FEE CHANGES

Docket No. R2001-1

**KeySpan Energy's Second Set Of Interrogatories And Document  
Production Requests To USPS Witness Susan Mayo**

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 Susan Mayo: **KE/USPS-T36-3**. 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  
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540-554-8880

Counsel for

**KeySpan Energy**

**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 Second Set Of Interrogatories And Document  
Production Requests For USPS Witness Susan W. Mayo**

**KE/USPS-T36-3** Please refer to your responses to Parts I and K of Interrogatory KE/USPS-T36-2. There you indicate that, after revising your testimony, you believe that 942 QBRM recipients will decide to pay the \$1,800 quarterly fee, and that these customers will receive approximately 130.5 million total pieces.

- A. If, as you noted, the Postal Service data indicate that only 723 recipients received an average of 100,000 QBRM pieces per year, where are the extra 219 [942 – 723] recipients going to come from?
  
- B. If, as you noted in your response to Part F of the referenced interrogatory, Postal Service data indicate that at least 500,000 pieces were received by just 151 recipients who received more than 300 million pieces in total, how can 942 recipients receive just 130.5 million pieces in total?