

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS KINGSLEY TO INTERROGATORY OF KEYSpan ENERGY
(KE/USPS-T39-13) (ERRATA)

The United States Postal Service hereby provides the revised response of witness Kingsley to the following interrogatory of Keyspan Energy: KE/USPS-T39-13, filed on November 5, 2001. Subpart (f) of the original response, filed on November 19, 2001, requested volumes of barcoded and nonbarcoded letters for certain periods. Subsequent to the filing of its response, the Postal Service discovered that some of the data supplied in subpart (f) were inaccurate. This erratum is filed to correct those inaccuracies.

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

December 3, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF KEYSpan ENERGY

KE/USPS-T-39-13 Please refer to the Postal Service's response to Interrogatory OCA/USPS-62.

- A. Please confirm that the Postal Service barcoded 3,007,541,000 letters during AP 12, FY 01. If no, please explain
- B. Please confirm that the Postal Service failed to barcode 946,754,000 letters during AP 12, FY 01. If no, please explain
- C. Please confirm that the Postal Service could potentially have barcoded 3,007,541,000 plus 946,754,000 letters or 3,954,295,000 during AP 12, FY 01. If no, please explain.
- D. Please confirm that the Postal Service could not or did not barcode 946,754,000 /3,954,295,000 or 23.9 % of the letters during AP 12, FY 01, If no, please explain.
- E. For the test year, what percent of total letters will the Postal Service fail to barcode, given the fact that 23.9 % of the letters were not barcoded during AP 12, FY 01? Please support your answer.
- F. Please fill in the following table and correct any volume figures shown if they are not correct.

Volume of Barcoded and Non-barcoded Letters (000)

Subclass	Letters with USPS Applied Barcodes	Letters with Mailer Applied Barcodes	Letters Without Barcodes
FY 1999			
First Class	38,911,824	47,000,370	9,829,438
Standard	4,946,688	29,304,609	7,373,399
Total	43,858,512	76,304,979	17,202,837
FY 2000			
First Class	39,230,428	50,097,557	9,105,107
Standard	4,016,695	33,617,045	6,765,283
Total	43,247,124	83,714,601	15,870,390
FY 2001			
First Class	38,980,010	52,800,062	8,467,994
Standard	3,664,574	37,299,240	5,699,796
Total	42,644,584	90,099,302	14,167,790
AP 12, FY 01			
First Class	2,847,333	4,066,708	567,350
Standard	160,208	2,582,785	379,404
Total	3,007,541	6,649,493	946,754
AP 13, FY 01			
First Class	2,610,868	3,803,057	545,863
Standard	112,854	2,805,734	363,027
Total	2,723,722	6,608,791	908,890

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RESPONSE:

- A. Confirmed
- B. Not confirmed. The Postal Service will never be able to finalize 100% of letters and cards that are processed by the MLOCR-ISS and RCR systems. See response to MMA/USPS-T22-4D.
- C. Not confirmed. The Postal Service does not expect to finalize all letters and cards since not every card and letter can be read. The Postal Service attempts to barcode machinable cards and letters not pre-barcode, but due to insufficient addresses, addresses not matching the data base, etc., sometimes the attempts are unsuccessful. The non-machinable letters and cards that obviously can't be barcoded on an OCR or through RBCS are also included in the non-barcode volume. Unless all non-machinable letter volume goes away, we will be unable to reach anything close to 100%.
- D. Not confirmed. See KE/USPS-T39-13C. The 3.9 billion figure is only USPS-applied barcodes, not total barcodes.
- E. Under the Letter Recognition Enhancement Program (USPS-LR-J-62), the Postal Service has targeted a MLOCR-ISS/RCR finalization rate of 93.25. See response to MMA/USPS-T22-4D.
- F. Completed above. Total excludes Periodicals letters.

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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