

ORIGINAL

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

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POSTAL RATE COMMISSION  
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POSTAL RATE AND FEE CHANGES

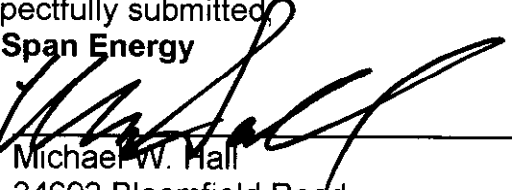
Docket No. R2001-1

**KeySpan Energy's Second Set Of Institutional Interrogatories And  
Document Production Requests To The United States Postal Service**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice,  
KeySpan Energy herewith submits the following interrogatories and document  
production requests to the **United States Postal Service: KE/USPS-2.**

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 30, 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 6th day of December 2001

  
Michael W. Hall

**KeySpan Energy's Second Set Of Interrogatories And Document  
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**KE/USPS-2** Please refer to the institutional responses to Parts E and F of Interrogatory KE/USPS-1. There you provided the numbers used to compute the percentages of First-Class metered letters and Total First-Class Single piece letters that were not barcoded.

- A. For metered mail you divided 2,757,607 by 50,076,946 to get 5.5%. Please confirm that this means that, within First-Class single piece, there are 50,076,946,000 metered letters of which 2,757,607,000 were not barcoded. If you cannot confirm, please explain what each of those numbers represents and the time period from which these numbers come.
- B. Assuming you did not confirm Part A, please provide the percentage of metered mail letters within First-Class single piece that were successfully barcoded for (1) 5-digits and (2) 9- or 11-digits) in the base year. If you do not have a breakout between 5-digits and 9- or 11-digits, please provide the percentage of metered mail letters within First-Class single piece that were successfully barcoded for 5-, 9- or 11-digits for the base year. Please provide the derivation of this percentage as well.
- C. For all First-Class single piece letters you divided 4,484,033 by 49,440,002 to get 9.1 %. Does this mean that of 49,440,002,000 First-Class letters of all shapes, 4,484,033,000 were not barcoded? If you cannot confirm, please explain what each of those numbers represents and the time period from which these numbers come.
- D. Assuming you did not confirm Part C, please provide the percentage of machinable letter shaped pieces within First-Class single piece that were successfully barcoded for (1) 5-digits and (2) 9- or 11-digits) in the base year. If you do not have a breakout between 5-digits and 9- or 11-digits, please provide the percentage of letter-shaped pieces within First-Class single piece that were successfully barcoded for 5-, 9- or 11-digits for the base year. Please provide the derivation of this percentage as well.