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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MAYO TO INTERROGATORY OF KEYSpan ENERGY
(KE/USPS-T36—3)

The United States Postal Service hereby provides the response of witness Mayo to the following interrogatory of KeySpan Energy: KE/USPS-T36—3, filed on November 29, 2001.

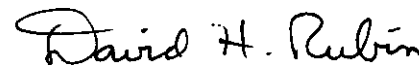
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



David H. Rubin

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December 13, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO TO
INTERROGATORY OF KEYSpan ENERGY

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?


RESPONSE:

A. My understanding is that the 723 recipients, as presented in the Docket No. R2000-1 survey, may have multiple accounts. The 942 figure in my workpapers is a projected number of accounts in the 2003 Test Year in this rate proceeding.

B. My understanding is that the 151 refers to 151 permits, which likely include many more than 151 accounts. In particular, the volume for some of the accounts may be less than the breakeven volume for QBRM paying a quarterly fee. Thus, the 300 million pieces may not all be QBRM paying a quarterly fee.

DECLARATION

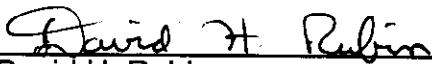
I, Susan W. Mayo, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.


SUSAN W. MAYO

Dated: DECEMBER 13, 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.



David H. Rubin

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