

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

**POSTAL RATE AND FEE CHANGES**

**Docket No. R2001-1**

**KeySpan Energy's First Set Of Follow Up 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-T39-22-23**. 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: /s/ Michael W. Hall  
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 and the Designated Officer of the Commission, in compliance with the Commission's Rules of Practice.

Dated this 20th day of December 2001.

/s/ Michael W. Hall  
Michael W. Hall

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Production Requests To USPS Witness Linda A. Kingsley**

**KE/USPS-T39-22** Please refer to your response to Parts B, C and D of Interrogatory KE/USPS-T39-17. There you claim that the Postal Service does not know what portion of non-barcoded letters is non-machinable. That answered Part B. Parts C and D asked you to provide the number of non-machinable First-Class single piece letters for the base and test years, respectively. It does not appear that you have answered those questions.

- A. Please confirm that, according to USPS witness Robinson, the Postal Service projects 585,607,000 non-machinable letters that weigh one ounce or less for the test year after rates. See her response to POIR 4, Question 6. If you cannot confirm, please explain.
- B. Please provide the volume (and source) of non-machinable First-Class single piece letters for the base year in this case. If this is not available, please state so and explain why not.
- C. Please provide the volume (and source) of non-machinable First-Class single piece letters for the test year before rates. If this is not available, please state so and explain why not.
- D. Please provide the volume (and source) of the non-machinable First-Class single piece letters for the test year after rates. If this information is not available, please state so and explain why not.
- E. Please provide the number of non-machinable First-Class letters for the test year after rates that weigh over one ounce, if you have not already done so in response to Part D above.

**KE/USPS-T39-23** Please refer to your response to Interrogatory KE/USPS-T39-20. We are having trouble understanding your response. You were asked to fill in a table for letter-shaped First-Class single piece letters and you changed the total volume, as far as we can tell, to include **all** shapes within First-Class single piece. You were asked for **prebarcoded** volumes and your answer referred to BRM and QBRM, but did not mention Courtesy Reply Mail. You were asked for First-Class single piece volumes resolved by the RCR and REC, but you indicate that the volumes that you entered refer not just for First-Class Mail Single Piece but also for "all letters and cards"

- A. Please explain what subclasses make up the RCR Resolved volume for BY 2000 (12,431,556,000 pieces). Does this include First-Class single piece letters, First-Class non-automation, presorted letters, First-Class single piece

cards, First-Class presorted cards, Periodical letters, and Standard Mail non-automation regular letters?

- B.
- C. Please explain what subclasses make up the REC Resolved volume for BY 2000 (9,358,796 pieces). Does this include First-Class single piece letters, First-Class non-automation, presorted letters, First-Class single piece cards, First-Class presorted cards, Periodical letters, and Standard Mail non-automation regular letters?
- D. Are the volumes discussed in Parts A and B not available for just First-Class single piece letters? If these figures are available for just First-Class single piece or First-Class single piece and nonautomation presorted combined, please provide those figures and explain what subclasses are included in those figures.
- E. Please confirm that, within First-Class single piece, all letters must be (1) RCR resolved, (2) REC resolved, (3) Prebarcoded, or (4) Not barcoded. If you cannot confirm, please explain why not.
- F. Please confirm that the sum of the RCR resolved volume plus the REC resolved volume will equal the volume barcoded by the Postal Service. If you cannot confirm, please explain.
- G. Please fill in the **entire** table below, if the requested information is available, for First-Class Single Piece letters. If you do not know the specific volumes for RCR resolved and REC resolved, please provide the total barcoded by the Postal Service, as shown in Column 3. If the data requested is available, please fill in the table even if you or another witness has provided that number in response to a previous interrogatory. If the data requested is not available, state so and place NA in the appropriate box. If you did not confirm Part D, please add the additional category or categories to the table. If you do not understand any part of this request, please ask your counsel to call KeySpan's attorney.

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

[1]                      [2]                      [3]                      [4]                      [5]                      [6]

First-Class Single Piece	RCR Resolved	REC Resolved	USPS Barcoded	Prebarcoded (BRM & CRM)	Not Barcoded (Mach & Non-mach)	Total Volume (Letter Shaped)
BY 2000						

TY 2000 BR						
TY 2000 AR						

[1] + [2]

[3]+[4]+[5]+[6]