

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 KINGSLEY TO INTERROGATORIES OF KEYSpan ENERGY
(KE/USPS-T39-22-23)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of Keyspan Energy: KE/USPS-T39-22-23, filed on December 20, 2001.

Each 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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3078, Fax -5402
January 3, 2002

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

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.

Response:

- A. Confirmed for total single-piece First-Class Mail.
- B. – E. Response to POIR 4 question 6 also states that the Postal Service does not have data that would allow it to count pieces over one ounce that have the physical characteristics similar to those pieces weighing one ounce or less paying the nonstandard surcharge. This applies to the base year, test year before rates, and test year after rates. Nor does Postal Service operations track letter-shaped volumes by machinability regardless of class, subclass, weight, or shape.

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

Therefore, the volume estimates you request specifically to First Class Mail single piece letters, are not available. Also see similar response to KE/USPS-T39-6D.

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

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.

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

**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]		

Response:

Courtesy Reply Mail base year volume was provided in response to KE/USPS-T39-7.

- A. Yes. As stated in the response to KE/USPS-T39-20, “ BY 2000 RCR and REC resolved volumes are for all (emphasis added) classes of letters and cards” and “Volume is not tracked by class, subclass or indicia in MODS.”
- B. (No question)
- C. See response to subpart A.
- D. Yes.
- E. Not confirmed. First-Class Mail single piece letters are also resolved by the MLOCR.
- F. Not confirmed. See response to subpart E.
- G. Since data are not available by subclass (i.e., single piece) and shape (i.e., letters only), I am unable to provide any more data than what were supplied in response to KE/USPS-T39-20, where data had been provided for each cell.

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
January 3, 2002