

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MILLER
TO INTERROGATORY OF KEYSpan ENERGY
(KE/USPS-T22-34)

The United States Postal Service hereby provides the response of witness Miller to the following interrogatory of KeySpan Energy: KE/USPS-T22-34, filed on December 21, 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

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
January 4, 2002

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

KE/USPS-T22-34 Please refer to your response to Part A of Interrogatory KE/USPS-T22-26 where you state that letters receiving a 5-digit barcode do not receive any kind of automated outgoing primary sort in the RBCS. In response to Part B of that same interrogatory you note that such pieces are sent from the RBCS to the incoming BCS primary, bypassing the outgoing BCS secondary.

- A. If 5-digit barcoded letters do not receive any kind of automated outgoing primary sort in the RBCS, are they simply combined into one stacker after the 5-digit barcode is applied? If no, please explain.
- B. Please explain how these letters get sorted to the appropriate MMP or SCF in order to receive an incoming BCS primary sort, if they are not sorted in the RBCS or the outgoing BCS secondary?

RESPONSE:

This interrogatory was erroneously filed as KE/USPS-T22-33. Consequently, the interrogatory number has been changed to KE/USPS-T22-34.

- (A) Yes.
- (B) The models assume that these 5-digit mail pieces are for ZIP Codes within the service area of the outgoing mail processing facility. In addition, this assumption has no bearing on the Qualified Business Reply Mail (QBRM) cost study as that cost study isolates the costs required to apply a barcode to a handwritten reply mail piece and does not include downstream Managed Mail Program (MMP) and incoming Sectional Center Facility (SCF) operations.

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.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
January 4, 2002