

RECEIVED
FEB 25 4 04 PM '02
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

COMMENTS OF THE UNITED STATES POSTAL SERVICE REGARDING
SUPPLEMENTAL DESIGNATIONS OF WRITTEN CROSS-EXAMINATION
BY KEYSpan ENERGY

On February 15, 2002, KeySpan Energy moved to designate additional written cross-examination of Postal Service witnesses Miller (USPS-T-22) and Kingsley (USPS-T-39) into the evidentiary record. That motion was opposed by the American Postal Workers Union, AFL-CIO, on February 21, 2002.

The Postal Service enters the fray solely to urge the Commission to treat particular enumerated interrogatories as an integrated whole, for purposes of designation into the record.

As the Postal Service understands the designation process, if a party directs an interrogatory to a witness (for example, interrogatory 1(a)-(f)), such that questions (a) through (f) are subparts of interrogatory 1, and none of these subparts is redirected to another witness or to the institution for response, then a party seeking to designate the response to any subpart answered by the witness must designate all subparts of interrogatory 1 answered by that witness.

KeySpan's list of requested supplemental designations identifies the responses of witness Miller to KE/USPS-T22-8(c) (November 21, 2001) and KE/USPS-T22-28(a) (December 17, 2001); and the response of witness Kingsley to KE/USPS-T39-13(f) (as

revised on December 3, 2001). It is not clear whether these designations are intended to exclude the responses to the other subparts of each interrogatory. If so, the Postal Service regards such designations as improper.

Accordingly, the Postal Service requests that the Commission ruling responsive to KeySpan's request for supplemental designations explicitly apply to all subparts of the responses to each of these enumerated interrogatories subject to KeySpan's request.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

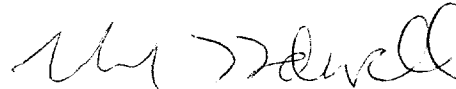
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

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
Tel: (202) 268-2998; Fax: -5402
mtidwell@email.usps.gov
February 25, 2002