

DOCKET SECTION

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

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Postal Rate and Fee Changes, 1997 :                   Docket No. R97-1  
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**CLARIFICATION OF  
THE BROOKLYN UNION GAS COMPANY**

At the hearings held on February 18, 1998, The Brooklyn Union Gas Company's ("Brooklyn Union") Witness Richard E. Bentley, was asked whether the weight averaging methodology used by Brooklyn Union to count prepaid reply mail pieces during a "test" period was the same as the weight averaging methodology Brooklyn Union used prior to the test period to verify postage.<sup>1</sup> Counsel for Brooklyn Union undertook to "inquire and inform" the record on this matter. Brooklyn Union's response is as follows:

(1) In general, the weight averaging methodology used by Brooklyn Union before and during the test were the same. Moreover, that methodology was consistent with the weight averaging method the Postal Service used prior to the test. Specifically, Brooklyn Union would select 50 representative return envelopes (excluding heavier pieces which might include correspondence in addition to the customer's check and the remittance portion of the bill). After determining the weight of all mail pieces, that weight was divided by the average unit weight of the 50 sample pieces to arrive at the total number of return mail pieces.

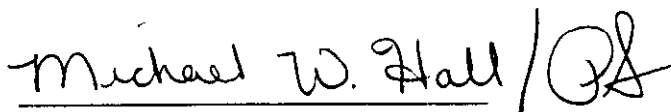
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<sup>1</sup> Tr. 21/11146.

(2) The methodology Brooklyn Union used during the test only differed from the methodology utilized prior to the test in one respect -- Brooklyn Union purchased a new high capacity postage scale. (Detecto Cardinal Scale Manufacturing Company, Model #285DF-5D) This scale automated the task of determining the number of return mail pieces. Specifically as before, Brooklyn Union selected 50 representative return mail pieces which were weighed on the new scale to confirm the count of 50 pieces. Then trays of return mail pieces were weighed. The scale automatically deducted the standardized tray weight and determine the number of pieces of return mail.

(3) As Mr. Bentley also testified, during the test, the Postal Service and Brooklyn Union used piece counts generated by independent third parties<sup>2</sup> to whom payment remittance were sent for processing in order to further verify the accuracy of the return mail piece counts derived by Brooklyn Union on a daily basis to determine postage due.

Respectfully submitted,



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Date: March 9, 1998  
Washington, D.C.


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<sup>2</sup> Tr.21/11142-43.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all relevant participants in accordance with Section 12 of the Rules of Practice and Rule 3(c) of the Special Rules of Practice in this proceeding.

Dated at Washington, D.C., this 9th day of March, 1998.

Michael W. Hall /   
Michael W. Hall