

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 INTERROGATORIES OF KEYSpan ENERGY
REDIRECTED FROM WITNESS BOZZO
(KE/USPS-T14-9(C) AND (E))

The United States Postal Service hereby provides the responses of witness Miller to the following interrogatories of KeySpan Energy: KE/USPS-T14-9(C) and (E), filed on November 14, 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

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
November 28, 2001

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

KE/USPS-T-14-9 Please refer to page 12 of Library Reference USPS-LR-J-60 where Mr. Miller presents his mail flow models for handwritten letters, worksheet "table" of Library Reference USPS-LR-J-56, and to page 4 of USPS-T- 39, the Direct Testimony of USPS witness Linda A. Kingsley.

- C. Please confirm that USPS witness Miller shows that for every 10,000 handwritten single piece letters that enter the RBCS ISS operation, 1,714 letters are sent through the OSS. If you cannot confirm, please explain.

- E. Are the number of letters fed into the ISS and OSS roughly even, as you show in USPS-LR-J-56, or is Mr. Miller correct in assuming that the number of pieces fed into the ISS is roughly 5+ times that of the pieces fed into the OSS? Please explain your answer.

RESPONSE:

- (C) Not confirmed. Please see the revisions filed on 11/15/01. All 10,000 handwritten reply mail letters found in USPS LR-J-60 on page 12 are processed through the Output Sub System (OSS).

- (E) Please see the revisions filed to USPS LR-J-60 on 11/15/01. Handwritten mail pieces would have their images lifted on an Advanced Facer Canceler System Input Sub System (AFCS-ISS), will proceed to Remote Bar Coding System (RBCS) operations, and must always be processed on an Output Sub System (OSS). Machine printed mail pieces, on the other hand, will have their images lifted by the Multi Line Optical Character Reader Input Sub System (MLOCR-ISS) and proceed to RBCS, if required. However, the MLOCR-ISS can apply barcodes directly to a great deal of these mail pieces such that they will bypass all subsequent RBCS operations, including the OSS. Consequently, it is reasonable to conclude that the volume processed in ISS and OSS operations are roughly even.

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

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