

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

POSTAL RATE AND FEE CHANGES

Docket No. R2001-1

**KeySpan Energy's First Set Of Follow Up
Interrogatories And Document Production Requests
To USPS Witness Michael W. Miller**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, KeySpan Energy submits the following interrogatories and document production requests to USPS witness **Michael W. Miller: KE/USPS-T22-34.** If the designated witness is unable to answer any of these questions, please direct them to the appropriate witness who can provide a complete response.

Respectfully submitted,

KeySpan Energy

By: /s/ Michael W. Hall
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Counsel for

KeySpan Energy

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing discovery request upon the United States Postal Service, the Designated Officer of the Commission, and participants who requested service of all discovery documents, in compliance with the Commission's Rules of Practice.

Dated this 21st day of December 2001.

/s/ Michael W. Hall
Michael W. Hall

**KeySpan First Set Of Follow Up Interrogatories And Document Production
Requests For USPS Witness Michael W. Miller**

KE/USPS-T22-33 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?