

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

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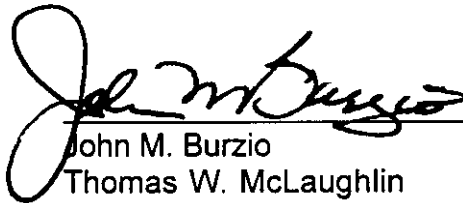
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF ADVO, INC.  
TO UNITED STATES POSTAL SERVICE WITNESS  
DONALD BARON (ADVO/USPS-T12-1-5)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to United States Postal Service witness Donald Baron. If the witness is unable to respond to any interrogatory, we request that a response be provided by appropriate USPS witness capable of providing an answer.

Respectfully submitted,



John M. Burzio  
Thomas W. McLaughlin  
Burzio & McLaughlin  
1054 31st Street, N.W.  
Washington, D. C. 20007  
Counsel for ADVO, INC.

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Thomas W. McLaughlin

February 22, 2000

ADVO, INC. INTERROGATORIES TO USPS WITNESS DONALD BARON

ADVO/USPS-T12-1. With respect to the FY98 accrued activity time proportions developed in LR I-159 from the Engineered Standards (ES) data collection, please provide any information you have on the following:

- (a) Statistical measures of accuracy or reliability available on the estimates of annual proportions of accrued activity time for each route sampled.
- (b) Statistical measures of accuracy or reliability available on the estimates of the annual proportions of accrued activity time for each route type for each zip sampled.
- (c) Statistical measures of accuracy or reliability available on the estimates of the annual proportions of accrued activity time for each route type for each region sampled.
- (d) Statistical measures of accuracy or reliability available on the estimates of the annual proportions of accrued activity time for each route type for the USPS city carrier system in its entirety.

ADVO/USPS-T12-2. With respect to the FY98 accrued activity time proportions developed in LR I-159 from the Engineered Standards (ES) data collection, did you, in any way, attempt to quantitatively validate these proportions with data from other sources? If so, please explain fully, and provide your analyses and results.

ADVO/USPS-T12-3. On page 31 of your testimony, you provide explanations for the terms Loading, Driving, Route-Access (FAT), Route-Access (CAT), and Collection Activity Categories. Prior to performing your analysis and submitting your testimony, did you review the Engineered Standards data set and attempt to:

- (a) Ensure that the Engineered Standards tally assignments to those activities matched precisely your definitions? If so, please explain what

you did, and identify any concerns you may have with respect to the precise matching of any Engineered Standards tally (or set of tallies) with your ratemaking definitions.

- (b) Check Mr. Raymond's assignments to various activity times in order to determine whether they were consistently applied? If so, please explain fully and identify any concerns you may have with respect to consistency of application.
- (c) Ensure that the definitions applied to the Engineered Standards data (and the times that were ascribed to them) correctly matched the ones used in the FAT, CAT, and LTV data collections? If so, please explain them.

ADVO/USPS-T12-4. With regard to the Engineered Standards data set and its use in this rate case:

- (a) Please describe all issues that you discussed with Mr. Raymond and when they were discussed.
- (b) Please provide all written guidance and describe all oral guidance you gave Mr. Raymond on how to ascribe tallies to the Drive, Load, FAT, CAT, Collection, and Street Support categories.
- (c) Please describe the types of Engineered Standards tallies that you assisted Mr. Raymond to identify in terms of Drive, Load, CAT, FAT, Collection, Street Support.

ADVO/USPS-T12-5. Did you independently review the Engineered Standards data set, prior to Mr. Raymond's activity category assignments, and attempt to assign them yourself? If so, please explain how many route-days of data you reviewed and whether you had any difficulties in making the assignments.