

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

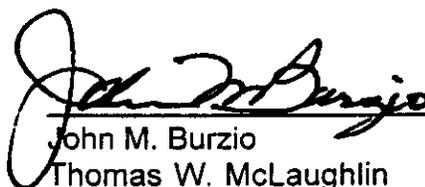
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF ADVO, INC.  
TO UNITED STATES POSTAL SERVICE WITNESS  
KAREN MEEHAN (ADVO/USPS-T11-1-3)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to United States Postal Service witness Karen Meehan. 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.

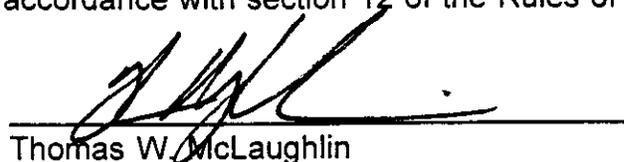
Respectfully submitted,



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 28, 2000

ADVO, INC. INTERROGATORIES TO USPS WITNESS KAREN MEEHAN

ADVO/USPS-T11-1. On your Workpaper B-7, please confirm that the following figures were not updated for Base Year 1998 but instead reflect Base Year 1996 results for City Carrier Letter Routes:

- (a) The Curblineline and Foot Access Test (CAT/FAT) split factors.
- (b) The Possible Stops and Possible Deliveries (PPS/PPD) coverage variabilities.
- (c) The Stops Variability with Respect to Delivery Activities.
- (d) The Deviation Deliveries Variability with Respect to Pieces.
- (e) The Route Loops/Dismounts Variability with Respect to Volume.

ADVO/USPS-T11-2. Please confirm the following Possible Stops coverages for Base Year 1996 and Base Year 1998. If you cannot, please provide the correct figures.

	<u>Base Year 1996</u>	<u>Base Year 1998</u>
Single Delivery Residential Stops	92.16%	92.94%
Multiple Delivery Residential Stops	96.09%	97.36%
Business And Mixed Stops	90.42%	89.92%

ADVO/USPS-T11-3. With respect to your Workpaper B-10, please explain the difference in accrued cost on WS 10.0.1 (\$3,678,215) and total pay data on WS 10.0.2 (\$2,480,986).