

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

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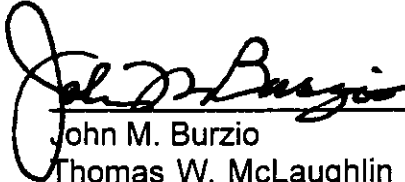
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF ADVO, INC.  
TO UNITED STATES POSTAL SERVICE WITNESS  
SHARON DANIEL (ADVO/USPS-T28-1-7)

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 SHARON DANIEL**

**ADVO/USPS-T28-1.** With respect to LR -I-92, LR92bECR.xls, Section 2, page 9 (Tab: volume&lbs), please:

- (a) Explain why total base year letter volume of 13,295,273,000 differs from the comparable volume of 12,943,926,795 shown in witness Moeller's WP-1, page 1.
- (b) Explain why total base year nonletter (flats + parcels) volume of 20,763,854,000 differs from the comparable volume of 21,115,199,912 (piece rated + pound rated) shown in witness Moeller's WP-1, page 1.
- (c) Reconcile total base year letter weight of 687,184,000 to 1998 billing determinants.
- (d) Reconcile total base year nonletter (flats + parcels) weight of 4,184,897,000 to 1998 billing determinants.

**ADVO/USPS-T28-2.** With respect to LR-95, spreadsheet LR95del.xls, tab "summaryBY," there is a figure of 8,330,028 for ECR Saturation Nonletters in the column labeled (000s) "Permit Volume." The total of this column for BY ECR is 34,059,127 which ties in with the Total ECR volume shown in witness Moeller's WP-1, p. 1. However, Moeller WP-1, p. 1, shows that BY NL ECR Saturation volumes are 8,940,756 (piece rated (6,184,030) + pound rated (2,756,726)). Please reconcile the difference.

**ADVO/USPS-T28-3.** Please confirm that the DPS cost savings distributed on page 12 of USPS LR I-95 are already included in the test year costs (from USPS-T-14, WP.H) used on pages 5 and 6. If you cannot, please explain why not.

**ADVO/USPS-T28-4.** Please refer to LRs I-97 and I-98:

- (a) Please explain how total ECR Vehicle Service Driver costs were distributed among the ECR subcategories and provide the rationale for that distribution key.

- (b) Please explain how total ECR Purchased Transportation costs were distributed among the ECR subcategories and provide the rationale for that distribution key.

ADVO/USPS-T28-5. Referring to LR I-173, please provide a comparison in tabular form of the shape definitions used by the DMM (Domestic Mail Manual), NCM (National Count of Mail), old RCCS (Rural Carrier Cost System), and new RCCS (LRCA).

ADVO/USPS-T28-6. Please clarify the discussion in LR I-173 on page 2:

- (a) Why are the 5-inch and 6 1/8-inch rules important to the RCCS/LRCA and NCM identification of rural DPS volume?
- (b) On that page, is the old RCCS termed the "old methodology" and the new RCCS (LRCA) termed the "new methodology"? If not, please explain what "old" and "new" mean.
- (c) Under the "old methodology," were some letters between 5 and 6 1/8 inches wide supposed to be categorized as rural-defined letters?
- (d) Under the "new methodology" are some letters between 5 and 6 1/8 inches wide supposed to be categorized as rural-defined letters?
- (e) Please provide the full name for the acronym "LRCA."

ADVO/USPS-T28-7. Please refer to Table 1 in LR I-173. Are the volumes by shape in that table defined (as much as possible) under the National Count of Mail rules rather than the Domestic Mail Manual rules? Please explain.