

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

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OFFICE OF THE SECRETARY

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POSTAL RATE AND FEE CHANGES, 2000  
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: Docket No. R2000-1  
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INTERROGATORIES OF ADVO, INC.  
TO UNITED STATES POSTAL SERVICE WITNESS  
THOMAS HARAUSH (ADVO/USPS-T3-1-10)

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



\_\_\_\_\_  
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Thomas W. McLaughlin  
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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

March 16, 2000

ADVO, INC. INTERROGATORIES TO USPS WITNESS THOMAS HARAUSH

ADVO/USPS-T3-1. For the numbers of deliveries included in ALDRAN.HQ059T01.CITY.PQ4FY97, please confirm that the term "delivery" as used there is consistent with the term "delivery" as used in the City Carrier Cost System. If this is incorrect, please explain fully the differences.

ADVO/USPS-T3-2. In ALDRAN.HQ059T01.CITY.PQ4FY97, there is a variable called DROPCNT which is the count of mail drop points on the route. Please explain what a "drop point" is and how it relates to number of deliveries.

ADVO/USPS-T3-3. Within ALDRAN.HQ059T01.CITY.PQ4FY97, four delivery types are indicated (Curb, NDCBU, Centralized, and Other), while in witness Raymond's LR I-163 dataset, there are five delivery types (Foot, Curb, Park & Loop, Dismount, and Central). Please provide a correspondence between these two sets of "delivery types" by filling in the table below. If one of witness Raymond's five delivery types belongs in one or more of the USPS four delivery types, please also specify and explain.

	"ALDRAN" Curb Delivery	"ALDRAN" NDCBU Delivery	"ALDRAN" Centralized Delivery	"ALDRAN" Other Delivery
I-163 Foot Delivery				
I-163 Curb Delivery	X			
I-163 Park & Loop Delivery				
I-163 Dismount Delivery				
I-163 Central Delivery			X	

ADVO/USPS-T3-4. Is a Dismount Delivery, as defined in ALDRAN.HQ059T01.CITY.PQ4FY97, distinguished by using some mail container other than a satchel (i.e., not using a satchel)? Please explain what distinguishes a Dismount Delivery from other delivery types, and provide examples.

ADVO/USPS-T3-5. With respect to Cluster Box (NDCBU) and Centralized Deliveries, can these two types be distinguished by the fact that NDCBUs are always outside and

Centralized Deliveries are always inside? If not, please explain what distinguishes these two delivery types, and provide examples.

ADVO/USPS-T3-6. In response to MPA/USPS-T12-32, witness Raymond uses the term "dismount delivery." Please provide the following information on dismount deliveries:

- (a) A definition of "dismount" delivery and an explanation of why deliveries are made as "dismounts" rather than some other way (e.g., curblines or park & loop).
- (b) Can there be more than one "dismount" delivery at a vehicle stop?
- (c) When the carrier's vehicle stops at a building, where several offices or residences are being served individually, are those "dismount," "park & loop," or some other type of deliveries? Please explain how these types of deliveries are distinguished by the USPS, and provide examples.
- (d) When the carrier's vehicle stops at a building where there may be a centralized delivery point, is that a dismount or a central delivery type? Please explain how dismount and motorized central deliveries are distinguished by the USPS, and provide examples.
- (e) When the carrier's vehicle stops at a centralized outside receptacle for delivery and the carrier must get out of the vehicle to make the deliveries, are those deliveries dismount, centralized, or something else? Please explain how they are distinguished by the USPS, and provide examples.
- (f) Are there routine curblines deliveries that are customer drops? Please explain. If so, how do they differ from dismount deliveries?

ADVO/USPS-T3-7. Are foot and park & loop deliveries both inside and outside? Please explain, and provide examples.

ADVO/USPS-T3-8. Can a carrier deliver to an NDCBU from within his vehicle or does he have to park and dismount? Please explain, and provide examples.

ADVO/USPS-T3-9. In response to MPA/USPS-T12-34, witness Raymond states that a Centralized Delivery unit is opened via a Postal owned lock and mail is deposited into individual customer compartments.

- (a) Are gang boxes or groupings of individual receptacles considered centralized deliveries? Please explain, and provide examples.
- (b) Are there any types of centralized delivery units where mail can be delivered without unlocking it (i.e., through 1- or 2-handed slots)?

ADVO/USPS-T3-10. For each year from FY1987 through FY1997, please provide for the USPS system of city carrier letter routes:

- (a) The estimated total annual number of actual and possible stops by stop type.
- (b) The estimated total annual number of actual and possible deliveries by stop type.
- (c) The average possible stops coverage figure by stop type.
- (d) The average possible deliveries coverage figure by stop type.