

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

ADVO, INC. IDENTIFICATION OF EXPECTED AMOUNT
OF CROSS-EXAMINATION AND REQUEST FOR
SPECIAL SCHEDULING OF DESIGNATED WITNESSES

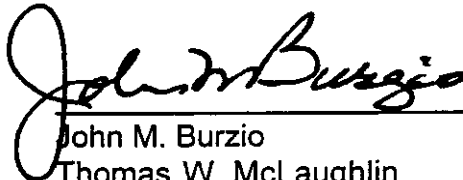
Pursuant to the Presiding Officer's Ruling No. R2000-1/4, ADVO, Inc. currently expects to conduct oral cross-examination of the following Postal Service witnesses to the extent indicated:

<u>USPS Witness</u>		<u>Extent of Cross-Examination</u>
Harahush	USPS-T-3	Light to Moderate
Kingsley	USPS-T-10	Light
Meehan	USPS-T-11	None to Light
Baron	USPS-T-12	Moderate
Raymond	USPS-T-13	Heavy
Miller	USPS-T-24	None to Light
Crum	USPS-T-27	None to Light
Daniel	USPS-T-28	Light to Moderate
Mayes	USPS-T-32	Light
Moeller	USPS-T-35	Light to Moderate

Advo requests that witnesses Raymond and Baron be scheduled near or at the end of the hearing period. Witness Raymond's testimony presents a new carrier survey which the Postal Service is using as support for a major change in delivery carrier cost attribution. The documentation for the survey is slim, the survey database

is complex, and a number of questions have been raised about the survey methods, the data collection, inconsistencies in the data, and the use of the results. Responses to many critical interrogatories have been delayed by Postal Service objections to providing even basic documentation and information about the study. These and many other interrogatories, including requests for additional data from the survey and other sources not provided in the Postal Service's filing, are still outstanding, and will require some analysis after receipt in order to prepare for oral cross-examination. Because witness Baron worked with witness Raymond in manipulating the survey data, and used the results of Raymond's testimony in his own testimony, the two witnesses should be scheduled to appear on the same or contiguous days at the end of the hearing period.

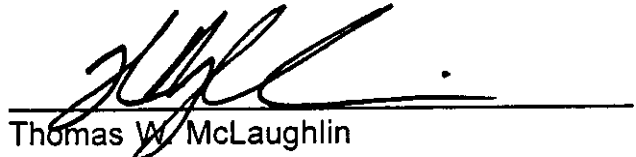
Respectfully submitted,



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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