

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

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POSTAL RATE COMMISSION
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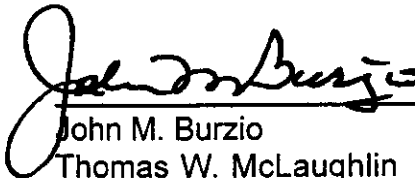
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF ADVO, INC.
TO UNITED STATES POSTAL SERVICE WITNESS
CHARLES CRUM (ADVO/USPS-T27-8-9)

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

March 16, 2000

ADVO, INC. INTERROGATORIES TO USPS WITNESS CHARLES CRUM

ADVO/USPS-T27-8. Please define completely the following terms:

- (a) Direct labor hours earned for all mail processing operations (at a Bulk Mail Center – BMC). In this definition, please include the types of BMC labor activities that cause or require “hours earned.”
- (b) Direct labor hours clocked for all mail processing operations (at a Bulk Mail Center - BMC). In this definition, please include the types of BMC labor activities that cause or require “hours earned.”
- (c) Do Methods Time Measurement (MTM) productivities represent of labor hours earned or labor hours clocked (to conduct a specific MTM activity) or something else? Please explain.

ADVO/USPS-T27-9. Please refer to your response to ADVO/USPS-T27-7(c).

- (a) Do any of the MTM productivities unadjusted by a volume-variability factor, represent anything other than a constant unit cost (i.e., as number of units change, unit time remains constant, with unit defined as in each individual MTM productivity)? If so, please identify them and describe clearly how they represent something other than a constant unit cost.
- (b) Do the MTM productivities adjusted by a volume-variability factor represent anything other than a constant unit cost (i.e., as number of units change, unit time remains constant, with unit defined as in each individual MTM productivity)? If so, please identify them and describe how they represent something other than a constant unit cost (with unit defined as in each individual MTM productivity).