

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
THOMAS HARAUSH (ADVO/USPS-T3-11-13)

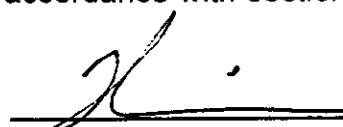
Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to United States Postal Service witness Thomas Harahush. If the witness is unable to respond to any interrogatory, we request that a response be provided by appropriate USPS witness capable of providing an answer.

Respectfully submitted,


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 20, 2000

ADVO, INC. INTERROGATORIES TO USPS WITNESS THOMAS HARAUSH

ADVO/USPS-T3-11. Since Base Year 1996, have there been any changes in the way in which City Carrier Cost System (CCS) has been collected or processed? If so, please identify each such change.

ADVO/USPS-T3-12. For each Route Type (in witness Meehan's Cost Segment 7 Worksheets) for the base year, please provide (in Excel spreadsheet format if possible) volume information, by shape and subclass, number of possible stops, number of possible deliveries, and number of actual stops for Business and Mixed stops that are:

- (a) Single Delivery Business
- (b) Multiple Delivery Business
- (c) Mixed Business and Residential
- (d) If the sums for (a) through (c) do not match the totals in witness Meehan's workpapers, please explain why and provide a reconciliation, if necessary.

ADVO/USPS-T3-13. For each Route Type (in witness Meehan's Cost Segment 7 Worksheets) for the base year, please provide (in Excel spreadsheet format if possible) volume information, by shape and subclass, number of possible stops, number of possible deliveries, and number of actual stops for Multiple Delivery Residential stops that are:

- (a) Neighborhood delivery and collection box unit
- (b) Delivery/postal center
- (c) Office/apartment building mail receptacle, front-loaded
- (d) Office/apartment building mail receptacle, rear-loaded
- (e) Curblin box
- (f) Multi-family house
- (g) Other
- (h) If the sums for (a) through (c) do not match the totals in witness Meehan's workpapers, please explain why and provide a reconciliation, if necessary.