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 LINDA KINGSLEY (ADVO/USPS-T10-1-3)

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

ADVO/USPS-T10-1. Does the level of mail volume received by a delivery unit in any way influence USPS decisions with respect to any aspect of DPS implementation? If so, explain how. If not, explain why not.

ADVO/USPS-T10-2. Does the average daily volume of DPS mail received by a delivery unit or carrier route tend to correlate in any way with the average daily total volumes of mail received (DPS and non-DPS); e.g., do delivery units or routes with high DPS volumes also tend, on average, to have high total mail volumes, compared to units or routes that receive low volumes of DPS mail? Please explain, and provide any available data or analyses.

ADVO/USPS-T10-3. Do delivery units or carrier routes with high DPS volumes tend, on average, to have higher pieces per stop and pieces per delivery than units or routes that receive low volumes of DPS mail? Please explain, and provide any available data or analyses.