

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
DONALD BARON (ADVO/USPS-T12-11)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to United States Postal Service witness Donald Baron. 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 23, 2000

ADVO, INC. INTERROGATORIES TO USPS WITNESS DONALD BARON

ADVO/USPS-T12-11. With regard to the Engineering Standards data or any other Delivery Redesign data, did you conduct any analyses of that data in an attempt to develop any alternative analyses of out-of-office street time, such as the following. If so, please provide the analyses, explain what you did, and explain why you have not presented it.

- (a) Variability analyses of collection, street support, drive time, FAT/CAT, or load time?
- (b) Any disaggregation of drive, FAT/CAT, or load time by delivery type (Level 11.2 codes), delivery type status (Level 11.3 codes), activity (Level 11.4 codes), or activity detail (Level 11.4.1 codes)?
- (c) Any comparison with disaggregated CCS results (volumes, possible stops, or actual stops by route type or stop type)?
- (d) Any other types of out-of-office costing analyses?