

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

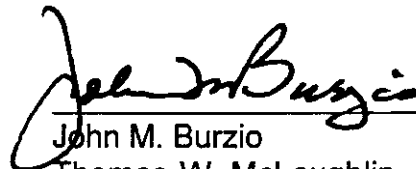
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF ADVO, INC.
TO UNITED STATES POSTAL SERVICE WITNESS
SHARON DANIEL (ADVO/USPS-T28-12-14)

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

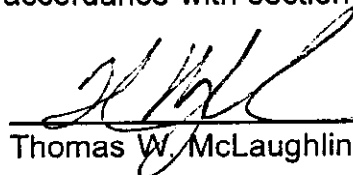
Respectfully submitted,



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 SHARON DANIEL

ADVO/USPS-T28-12. Please refer to the graph in ADVO/USPS-T28-8, which reproduces the graph in your LR-92 showing ECR unit costs by weight increment. The graph includes an unweighted linear regression line with the formula $y = 0.0192x + 0.0126$.

- (a) Please re-run this regression excluding the data point for the last 15-16 ounce weight increment, and provide the resulting equation.
- (b) Please provide a graph comparable to that in ADVO/USPS-T28-8 showing (i) all unit cost data points, (ii) your original regression line and equation, and (iii) the regression line and equation from part (a) above.

ADVO/USPS-T28-13. Please provide the data in LR-92, Section 2, pages 14-15 (ECR letters) and 17-18 (ECR flats), disaggregated by density level for (i) basic and (ii) high-density/saturation mail.

ADVO/USPS-T28-14. Please refer to Table 7 on page 29 of your testimony.

- (a) Please identify the test year attributable costs, by cost component, that are not included in those figures.
- (b) Please provide a unit estimate of those excluded attributable costs by shape and density level.
- (c) If those excluded attributable costs do not vary by shape or density level, please so state.