

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

RECEIVED
MAR 23 3 32 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

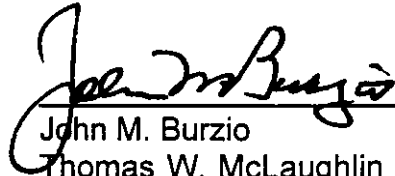
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF ADVO, INC.
TO THE UNITED STATES POSTAL SERVICE
(ADVO/USPS-1-8)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to the United States Postal Service. 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 THE UNITED STATES POSTAL SERVICE

ADVO/USPS-1. To the extent available, please provide estimated total weight, total volume, and total number of containers by point of entry for ECR mail in the following format. If information is also available by shape and or density level, please provide that information as well. For any data provided, please identify the source.

	Mailer-Prepared Rolling Containers	Mailer-Prepared Pallets (with Trays or Bundles)	Mailer-Prepared Trays	Mailer-Prepared Sacks	All Other Mailer-Prepared Containers
Entered at Origin Facility					
Entered at DBMC					
Entered at DCSF					
Entered at DDU					

For "all other" containers, please describe the types of containers included.

If there is information on ECR container and entry profiles, but not in the precise format shown above, please provide the available information and explain the format of the data.

ADVO/USPS-2. For each of the mailer-prepared container types identified in ADVO/USPS-1, please provide the specified weight limitations.

ADVO/USPS-3. Please provide the following information, and indicate their sources:

- (a) The most recent conversion factors (pieces and/or weight) available on all container types prepared in-house by the USPS.
- (b) Any information or estimates available on the proportion of in-house containers containing volume which are filled to capacity either by weight or by volume.
- (c) The weight limitations on all container types prepared in-house by the USPS.

- (d) Piece and container weight limitations for all mechanized and automated equipment.

ADVO/USPS-4. For Foot deliveries made by city letter route carriers, please provide the most recent data (including that from any delivery redesign project) available on the following. Please also identify the source of all data.

- (a) The average volume and weight delivered on a relay.
- (b) A distribution of the total number of relays used to calculate (a) to the corresponding volumes and weights served. (The weighted average of volumes and weights per relay calculated from the distribution should equal the overall averages given in (a).)

ADVO/USPS-5. Please describe any weight information that is routinely collected on mail processing operations (e.g., MODS, PIRS) and explain how it is used.

ADVO/USPS-6. Please describe any weight information that is routinely collected on city delivery carrier operations and explain how it is used.

ADVO/USPS-7. Please provide any city letter carrier data, or standards developed in the delivery redesign program, indicating the effect of mail weight on any city letter carrier operation.

ADVO/USPS-8. In Docket R97-1, witness Degen (USPS-T-12) indicated that workload measures for Allied Operations were being collected. Please provide the following:

- (a) Identification of each type of "allied operation" for which data were being collected
- (b) A description of the workload measures that were being collected for each type of "allied operation".
- (c) An explanation of the status of that data collection.