

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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Postal Rate and Fee Changes, 2000

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Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
WITNESS RAYMOND TO ADVO INTERROGATORIES  
(ADVO/USPS-T13-2, 19)

The United States Postal Service hereby provides the response of witness Raymond to the following interrogatories of Advo, Inc.: ADVO/USPS-T13-2, 19, filed on February 22, 2000. These responses are provided pursuant to Presiding Officer's Ruling No. R2000-1/18.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Richard T. Cooper

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Washington, D.C. 20260-1137  
March 29, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO  
INTERROGATORIES OF ADVO, INC.

ADVO/USPS-T13-2. With respect to the specific project which generated the data presented in your testimony, please provide the following:

- (a) A full description of your original work plan proposed to the USPS for each contract you performed on this specific project.
- (b) The statement of work and list of deliverables for each contract you performed on this specific project.
- (c) List of reports, analyses, and all other documentation you prepared on each contract you performed on this specific project.
- (d) Contract initiation and completion dates for each contract you performed on this specific project.

RESPONSE:

(a-d) Library Reference USPS LR-I-252, to be filed shortly, includes:

1. the requested work plans with statements of work and lists of deliverables,
2. a list of reports, analysis, and other documentation; and
3. the contract dates.

Note that Line items 490 through 524 on pages 278 through 283 are file boxes of route adjustment information for the Engineered Standards Test sites, and not binders (as incorrectly indicated on the list).

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO  
INTERROGATORIES OF ADVO, INC.

ADVO/USPS-T13-19. With respect to the use of the Engineered Standards data for "support/update" of the Street-Time Survey (STS):

(c) Please provide copies of all requests, proposals, instructions and correspondence with the USPS and/or USPS contractor representatives relating to such use of the ES data.

RESPONSE:

(a) All discussions were verbal, and no records were kept of the content of these discussions.

## DECLARATION

I, Lloyd B. Raymond, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Lloyd B. Raymond

Date: 3-29-00

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
Richard T. Cooper

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