

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

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OFFICE OF THE SECRETARY

Postal Rate and Fee Changes

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO ADVO INTERROGATORIES REDIRECTED FROM WITNESS HARAUSH
(ADVO/USPS-T3-5-9)

The United States Postal Service hereby provides responses to the following interrogatories of the Advo, Inc.: ADVO/USPS-T3-5-9, filed on March 20, 2000. These interrogatories were redirected from witness Haraush to the Postal Service.

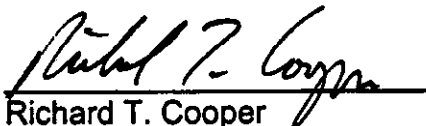
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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March 30, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF ADVO,
INC. REDIRECTED FROM WITNESS HARA HUSH

ADVO/USPS-T3-5. With respect to Cluster Box (NDCBU) and Centralized Deliveries, can these two types be distinguished by the fact that NDCBUs are always outside and Centralized Deliveries are always inside? If not, please explain and provide examples.

RESPONSE:

No.

NDCBU deliveries are served through Neighborhood Delivery and Collection Box Units only. Other Centralized Delivery includes deliveries made to other centralized delivery equipment (i. e. apartment house receptacles, delivery centers, or mailroom receptacles). Generally, this category pertains to any mail receiving unit where the carrier has access to more than one individual's receptacle by opening only the door or a single Arrow lock.

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ADVO/USPS-T3-6. In response to MPA/USPS-T12-32, witness Raymond uses the term "dismount delivery." Please provide the following information on dismount deliveries:

- (a) A definition of "dismount" delivery and an explanation of why deliveries are made as "dismounts" rather than some other way (e.g., curblines or park & loop).
- (b) Can there be more than one "dismount" delivery at a vehicle stop?
- (c) When the carrier's vehicle stops at a building, where several offices or residences are being served individually, are those "dismount," "park & loop," or some other type of deliveries? Please explain how these types of deliveries are distinguished by the USPS, and provide examples.
- (d) When the carrier's vehicle stops at a building where there may be a centralized delivery point, is that a dismount or a central delivery type? Please explain how dismount and motorized central deliveries are distinguished by the USPS, and provide examples.
- (e) When a carrier's vehicle stops at a centralized outside receptacle for delivery and the carrier must get out of the vehicle to make the deliveries, are those deliveries dismount, centralized, or something else? Please explain how they are distinguished by USPS, and provide examples.
- (f) Are there routine curblines deliveries that are customer drops? Please explain. If so, how do they differ from dismount deliveries?

RESPONSE:

Witness Raymond's dataset includes delivery types that were classified particularly for the study's purpose. The term dismount delivery includes references to both the type of delivery (foot route, Curblines, Park & Loop, Dismount, and Other) and the mode of delivery (Curb, NDCBU, Other Centralized, and Other).

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**ADVO/USPS-T3-7. Are foot and park & loop deliveries both inside and outside?
Please explain and provide examples.**

RESPONSE:

Both foot and park & loop deliveries can be either inside and outside.

A foot route may include deliveries made to businesses both inside and outside a shopping center.

A park & loop route might include deliveries in a strip mall where the carrier makes deliveries both inside and outside.

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ADVO/USPS-T3-8. Can a carrier deliver to an NDCBU from within his vehicle or does he have to park and dismount? Please explain and provide examples.

RESPONSE:

A carrier can deliver to an NDCBU from inside his vehicle (NDCBU on curb with its rear facing the street) or outside his vehicle (NDCBU on curb with its front facing the street).

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ADVO/USPS-T3-9. In response to MPA/USPS-T12-34, witness Raymond states that a Centralized Delivery unit is opened via a Postal owned lock and mail is deposited into individual customer compartments.

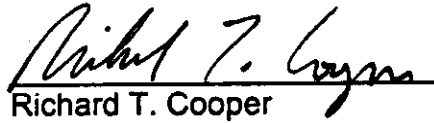
- (a) Are gang boxes or groupings of individual receptacles considered centralized deliveries? Please explain, and provide examples.
- (b) Are there any types of centralized delivery units where mail can be delivered without unlocking it (i.e., through 1- or 2- handed slots)?

RESPONSE:

- (a) Generally, central delivery pertains to any mail receiving unit where the carrier has access to more than one individual customer's receptacle by opening only one door or a single Arrow lock.
- (b) No. However, it must be recognized that in units such as VIM rooms and apartment buildings a key may not unlock the delivery equipment, rather the key unlocks a room giving the carrier access to the delivery equipment.

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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