

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
WITNESS HARAHUSH TO ADVO INTERROGATORIES
(ADVO/USPS-T3-1-4, 10)**

The United States Postal Service hereby provides the responses of witness Harahush to the following interrogatories of the Advo, Inc.: ADVO/USPS-T3-1-4, 10, filed on March 20, 2000. Interrogatories 5-9 were redirected to the Postal Service.

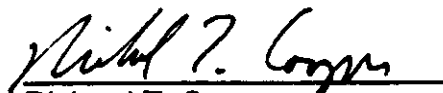
Each interrogatory is stated verbatim and is followed by the response.

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 WITNESS HARAUSH TO
INTERROGATORIES OF ADVO INC.

ADVO/USPS-T3-1. For the numbers of deliveries included in ALDRAN.HQ059T01.CITY.PQ4FY97, please confirm that the term "delivery" as used there is consistent with the term "delivery" as used in the City Carrier System. If this is incorrect, please explain fully the differences.

RESPONSE:

Confirmed.

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ADVO/USPS-T3-2. In ALDRAN.HQ059T01.CITY.PQ4FY97, there is a variable called DROPCNT which is the count of mail drop points on the route. Please explain what a "drop point" is and how it relates to number of deliveries.

RESPONSE:

A drop point is a place where a carrier delivers mail for the number of customers listed under DROPCNT.

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ADVO/USPS-T3-3. Within ALDRAN.HQ059T01.CITY.PQ4FY97, four delivery types are indicated (Curb, NDCBU, Centralized, and Other), while in witness Raymond's LR-I-163 dataset, there are five delivery types (Foot, Curb, Park & Loop, Dismount, and Central). Please provide a correspondence between these two sets of "delivery types" by filling in the table below. If one of witness Raymond's five delivery types belongs in one or more of the USPS four delivery types, please also specify and explain.

	"ALDRAN" Curb Delivery	"ALDRAN" NDCBU Delivery	"ALDRAN" Centralized Delivery	"ALDRAN" Other Delivery
I-163 Foot Delivery				
I-163 Curb Delivery	X			
I-163 Park & Loop Delivery				
I-163 Dismount Delivery				
I-163 Central Delivery			X	

RESPONSE:

The ALDRAN file includes data by route. As such, the ALDRAN file has a delivery type for each route. It also has the count of deliveries by delivery mode (Curb, NDCBU, Other Centralized, and Other) for each route.

Witness Raymond's dataset includes delivery types (modes in delivery terminology) that were classified particularly for the study's purpose.

The ALDRAN file would include Raymond's dismount delivery "type," for example, in one of the four delivery types listed for the route in ALDRAN. The table below shows a representation of where Raymond's delivery types could fit into ALDRAN delivery types.

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	"ALDRAN" Curb Delivery	"ALDRAN" NDCBU Delivery	"ALDRAN" Centralized Delivery	"ALDRAN" Other Delivery
I-163 Foot Delivery		X	X	X
I-163 Curb Delivery	X	X		X
I-163 Park & Loop Delivery	?	X	X	X
I-163 Dismount Delivery		X	X	X
I-163 Central Delivery			X	

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ADVO/USPS-T3-4. Is Dismount Delivery, as defined in ALDRAN.HQ059T01.CITY.PQ4FY97, distinguished by using some mail container other than a satchel (i.e., not using a satchel)? Please explain what distinguishes a Dismount Delivery from other delivery types, and provide examples.

RESPONSE:

Dismount delivery, as defined in ALDRAN, refers to a type of route, not the mode of individual delivery.

The mail container does not distinguish one type of route from another. A particular piece of equipment can be used on several types of routes.

A dismount route is a city delivery route on which 50 percent or more of the possible deliveries are made by dismount delivery to the door, Vertical Improved Mail (VIM) Room, Neighborhood Delivery and Collection Box Unit (NBU), Delivery Centers, etc. (If the dismount deliveries are less than 50 percent of the total possible deliveries for a route, the route will be classified as per the majority of the type delivery; e.g., curblines, park and loop, etc.)

A curblines route is a motorized city delivery route on which 50 percent or more of the possible deliveries are made to customer mailboxes at the curb.

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A park and loop route is a route that uses a motor vehicle for transporting all classes of mail to the route. The vehicle is used as a movable container as it is driven to designated park points. The carrier then loops segments of the route on foot.

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ADVO/USPS-T3-10. For each year, from FY1987 through FY1997, please provide for the USPS system of city carrier letter routes:

- (a) The estimated total annual number of actual and possible stops by stop type.
- (b) The estimated total annual number of actual and possible deliveries by stop type.
- (c) The average possible stops coverage figure by stop type.
- (d) The average possible deliveries coverage figure by stop type.

RESPONSE:

- (a) See attached sheets for FY 1993, 1995, 1996, and 1997, the requested data that is currently available.
- (b) The data are not available.
- (c) The following data are available for SDR, MDR, and BAM stop types.

FY	Coverage Level		
	SDR	MDR	BAM
1988	0.919	0.973	0.911
1989	0.927	0.979	0.919
1993	0.924	0.977	0.915
1995	0.933	0.971	0.920
1996 ¹	0.921	0.961	0.904
1997	0.923	0.969	0.894

- (d) The data are not available.

¹ In R-97, coverages were computed individually by route type.

Attachment to ADVO/USPS-T3-10(a)

		Bus Foot	Bus Mot	Res Foot	Res P&L	Res Curb	Mix Foot	Mix P&L	Mix Curb
1993 A	SDR Pos	9,952	6,016	1,019,306	7,505,964	3,325,563	15,325	233,748	40,734
1993 A	MDR Pos	927	1,178	217,054	637,749	144,993	8,489	24,825	627
1993 A	BAM Pos	46,356	43,090	120,725	605,147	154,930	14,413	194,325	19,769
1993 A	SDR Act	10,617	6,919	1,161,046	8,097,935	3,565,098	17,091	249,984	42,614
1993 A	MDR Act	1,007	1,178	225,707	648,575	146,032	9,001	25,181	684
1993 A	BAM Act	51,353	45,472	134,850	661,898	168,902	15,838	207,827	23,756

Attachment to ADVO/USPS-T3-10(a)

		Bus Foot	Bus Mot	Res Foot	Res P&L	Res Curb	Mix Foot	Mix P&L	Mix Curb
1995 A	SDR Pos	10292	24503	1167956	8125497	3469724	17025	290272	39175
1995 A	MDR Pos	1043	1475	246165	658160	149584	10129	28740	1220
1995 A	BAM Pos	64290	54294	131533	664342	138614	22455	235110	23859
1995 A	SDR Act	10292	24503	1051923	7574434	3282300	15804	272394	38626
1995 A	MDR Act	1043	1475	229514	646239	148243	9702	28252	1220
1995 A	BAM Act	61807	51524	115579	610855	127803	21174	218818	19771

Attachment to ADVO/USPS-T3-10(a)

		Bus Foot	Bus Mot	Res Foot	Res P&L	Res Curb	Mix Foot	Mix P&L	Mix Curb
1996 A	SDR Pos	8718	31136	1181321	8283510	3499788	14787	317247	43876
1996 A	MDR Pos	1719	2701	245931	624547	141891	10758	24682	1820
1996 A	BAM Pos	65845	51972	114406	664575	143946	19639	229565	24065
1996 A	SDR Act	7359	28311	1039881	7640996	3267941	12779	291875	42123
1996 A	MDR Act	1684	2668	220307	611814	140171	10160	24203	1819
1996 A	BAM Act	61196	47457	100318	597841	132567	18495	211016	19224

Attachment to ADVO/USPS-T3-10(a)

		Bus Foot	Bus Mot	Res Foot	Res P&L	Res Curb	Mix Foot	Mix P&L	Mix Curb
1997 A	SDR Pos	7222	45905	1154645	7924710	4860896	4722	67893	19062
1997 A	MDR Pos	1502	2927	202538	528796	380879	1274	6343	1130
1997 A	BAM Pos	40703	128635	157500	648364	395816	6958	29275	5847
1997 A	SDR Act	6539	40095	1062445	7298278	4505976	4059	59737	17382
1997 A	MDR Act	1428	2863	195314	515719	368459	1211	5903	1130
1997 A	BAM Act	37449	110573	138933	583206	354935	6256	25595	5345

DECLARATION

I, Thomas W. Harahush, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

Thomas W. Harahush
Thomas W. Harahush

Date: March 30, 2000

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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March 30, 2000