

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

RECEIVED
MAR 30 4 53 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes

Docket No. R2000-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO ADVO INTERROGATORY 13 TO WITNESS HARAUSH
(ADVO/USPS-T3-11)
March 30, 2000

The United States Postal Service hereby objects to the following interrogatories of the Advo, Inc.: ADVO/USPS-T3-11, filed on March 20, 2000. The question is as follows:

ADVO/USPS-T3-13. For each Route Type (in witness Meehan's Cost Segment 7 Worksheets) for the base year, please provide (in Excel spreadsheet format if possible) volume information, by shape and subclass, number of possible stops, number of possible deliveries, and number of actual stops for Multiple Delivery Residential stops that are:

- (a) Neighborhood delivery and collection box unit
- (b) Delivery/postal center
- (c) Office/apartment building mail receptacle, front-loaded
- (d) Office/apartment building mail receptacle, rear-loaded
- (e) Curbline box
- (f) Multi-family house
- (g) Other
- (h) If the sums for (a) through (c) do not match the totals in witness Meehan's workpapers, please explain why and provide a reconciliation, if necessary.

The Postal Service objects on the grounds of relevance and undue burden. Before deciding to object, the Postal Service carefully considered the workload necessary to prepare the 56 tables of information (8 route types, by 7 subparts) that would need to be produced to respond to this question. This would be no small undertaking. The Postal Service has determined that fully two weeks of effort would be

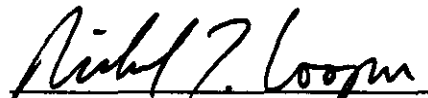
needed for its analysts to provide the requested information. This amount of effort is undue considering the tangential relevance of the detailed information sought, which distinguishes volumes and numbers of possible deliveries etc. down to the level of whether a particular apartment building mail receptacle is front-loaded or rear-loaded. Absent a demonstrated, compelling need for the extremely large effort needed to produce such a disaggregation, the Postal Service objects to its provision.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

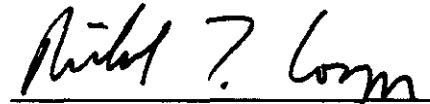
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
(202) 268-2993; Fax: -5402
Washington, D.C. 20260-1137
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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
March 30, 2000