

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS KINGSLEY TO INTERROGATORIES OF
ADVO, INC.
(ADVO/USPS-T10-1-3)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of Advo, Inc.: ADVO/USPS-T10-1-3, filed on March 20, 2000.

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



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990 Fax -5402
April 3, 2000

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

ADVO/USPS-T10-1 Does the level of mail volume received by a delivery unit in any way influence USPS decisions with respect to any aspect of DPS implementation? If so, explain how. If not, explain why not.

Response:

In marginal cases, considering whether to implement DPS in a small delivery unit with 5 to 10 routes, analysts consider a number of factors such as distance to the plant, schemes, and processing capacity. Volume may be a consideration in such cases.

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

ADVO/USPS-T10-2 Does the average daily volume of DPS mail received by a delivery unit or carrier route tend to correlate in any way with the average daily total volumes of mail received (DPS and non-DPS) e.g., do delivery units or routes with high DPS volumes also tend, on average, to have high total mail volumes, compared to units or routes that receive low volumes of DPS mail? Please explain, and provide any available data or analyses.

Response:

Generally, yes. However, there are exceptions such as routes with a high proportion of flats. I am not aware of any available data or analysis on this topic.

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

ADVO/USPS-T10-3 Do delivery units or carrier routes with high DPS volumes tend, on average, to have higher pieces per stop and pieces per delivery than units or routes that receive low volumes of DPS mail? Please explain, and provide any available data or analyses.

Response:

Not necessarily. The number of stops on a route, largely determined by the travel time between stops, certainly affects the total DPS volume, but I am not aware of any direct effect on the DPS volume per delivery. I am not aware of any analyses on this topic.

DECLARATION

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

Linda A. Kingsley

Date: 4-3-2000

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.

A handwritten signature in black ink, appearing to read "Susan M. Duchek", is written over a solid horizontal line.

Susan M. Duchek

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