

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

RECEIVED
APR 4 3 01 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY


POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

FOLLOW-UP INTERROGATORIES OF ADVO, INC.
TO UNITED STATES POSTAL SERVICE WITNESS
DONALD BARON (ADVO/USPS-T12-12-15)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following follow-up interrogatories to United States Postal Service witness Donald Baron. If the witness is unable to respond to any interrogatory, we request that a response be provided by appropriate USPS witness capable of providing an answer.

Respectfully submitted,



John M. Burzio
Thomas W. McLaughlin
Burzio & McLaughlin
1054 31st Street, N.W.
Washington, D. C. 20007
Counsel for ADVO, INC.

CERTIFICATE OF SERVICE

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



Thomas W. McLaughlin

April 4, 2000

ADVO, INC. FOLLOW-UP INTERROGATORIES TO USPS WITNESS BARON

ADVO/USPS-T12-12. Please refer to the table in your response to MPA/USPS-T10-21 (redirected from witness Kingsley) concerning estimated access time per actual stop for foot, park & loop, and dismount stops.

- (a) Provide the full set of data and calculations, including your sources, used to develop the estimated access times per actual stop for foot, park & loop, and dismount stops.
- (b) Are the figures in the first table (18.45 seconds in 1989 and 13.19 seconds in 1998) an average for foot, park & loop, and dismount stops combined, or an average for only foot/park & loop? Please explain.
- (c) Provide your explanation or opinion of why the average access time for such stops in (b) has declined so much in nine years (from 18.45 to 13.19 seconds per stop).

ADVO/USPS-T12-13. Please refer to the table in your response to MPA/USPS-T10-21 concerning estimated access time per actual stop for curblines stops.

- (a) Provide the full set of data and calculations, including your sources, used to develop the estimated access times per actual stop for curblines stops.
- (b) Provide your explanation or opinion of why the average access time for such stops in (e) has declined from 12.06 seconds in 1989 to 4.91 seconds per stop in 1998.

ADVO/USPS-T12-14. Please refer to your response to MPA/USPS-T10-22, where you state that the deliveries data required to answer the interrogatory could not be located. Do you have any opinion or knowledge (as opposed to actual data) as to:

- (a) whether the average run time among curblines deliveries has changed as much as the average access time has changed (as indicated in your response to MPA/USPS-T10-21)? Please explain fully.
- (b) whether the average run time among park & loop, foot, or dismount deliveries has changed as much as the average access time has changed (as indicated in your response to MPA/USPS-T10-21)? Please explain fully.
- (c) whether the average run time among central deliveries has changed between FY89 and FY98? Please explain fully.

ADVO/USPS-T12-15. Please refer to your response to MPA/USPS-T10-23.

- (a) Provide the full set of data and calculations, including your sources, used to develop the estimated travel times for each route group (foot, park & loop, curblines) in 1989 and 1998.
- (b) Aside from the fact that the FY89 data were collected by the Street Time Survey and the FY98 data were collected by the Engineered Standards Activity Sampling, do you have any explanation or opinion of:
 - (1) Why the average travel time per possible stop on foot routes has declined from 9.67 seconds in 1989 to 4.80 seconds per stop in 1998.
 - (2) Why the average travel time per possible stop on park & loop routes has increased from 3.09 seconds in 1989 to 3.94 seconds per stop in 1998.
 - (3) Why the average travel time per possible stop on curblines routes has increased from 1.14 seconds in 1989 to 1.86 seconds per stop in 1998.
- (d) Explain fully your understanding of whether the FAT (foot and park & loop Foot Access Test) models from which the proportions of foot/park & loop/dismount access and route time are derived show such a major decline in amount of foot and park&loop access time.
- (c) Explain fully your understanding of whether the CAT (Curblines Access Test) model from which the proportions of curblines access and route time are derived shows such a major decline in amount of curblines access time.