

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

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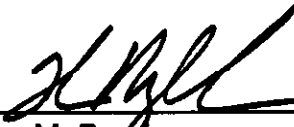
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

REPLACEMENT INTERROGATORIES OF ADVO, INC.
TO UNITED STATES POSTAL SERVICE WITNESS
THOMAS HARAUSH (ADVO/USPS-T3-15-16)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to United States Postal Service witness Thomas Harahush, in replacement of Advo interrogatory ADVO/USPS-T3-13 which the Postal Service objected to on grounds of burden (Opposition of United States Postal Service to Advo Interrogatory 13 to Witness Harahush, March 30, 2000). We have discussed these replacement interrogatories with Postal Service counsel, and have been advised that they alleviate the burden problem associated with the earlier interrogatory.

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. INTERROGATORIES TO USPS WITNESS THOMAS HARAUSH

ADVO/USPS-T3-15. For each Route Type (in witness Meehan's Cost Segment 7 Worksheets) for the base year, please provide (in Excel spreadsheet format if possible) numbers of possible stops and possible deliveries for Multiple Delivery Residential stops that are:

- (a) NDCBUs and locked Curblines Centralized Receptacles
- (b) Delivery/Postal Centers
- (c) Office/Apartment Building Mail Receptacles, front- or rear -loaded
- (d) Curblines Boxes that are not locked with a key, if any
- (e) Multi-family House or Other Receptacles

If the sums for (a) through (e) do not match the totals in witness Meehan's workpapers, please explain why and provide a reconciliation, if necessary.

ADVO/USPS-T3-16. As used in the City Carrier Cost System, please provide a description/definition of the following:

- (a) Delivery/Postal Centers (e.g., what proportion of the time does a carrier just drop off mail to such centers as opposed to casing it.).
- (b) Multiple Delivery Residential Curblines Boxes.
- (c) Multiple Delivery Residential Other Receptacles.