

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

ADVO, INC. INTERROGATORIES TO THE UNITED  
STATES POSTAL SERVICE CONCERNING QUESTIONS  
RAISED AT THE APRIL 13 HEARING (ADVO/USPS-9-10)

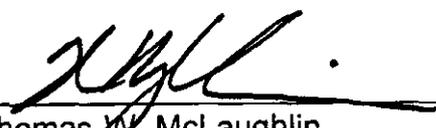
At the hearing held on April 13, 2000, counsel for Advo, Inc. (Advo) questioned United States Postal Service witness Kingsley about her statements concerning the relative volume growth of flats compared to letters from FY 1988 to FY 1998. However, the witness was unable to supply supporting data. Tr. 5/2111-112. Pursuant to the Presiding Officer's suggestion (Tr. 2113-114), Advo hereby submits the following interrogatories to the Postal Service seeking this information. We request that a response be provided by appropriate USPS witness capable of providing an answer.

Respectfully submitted,

  
\_\_\_\_\_  
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Thomas W. McLaughlin  
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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 17, 2000

ADVO, INC. INTERROGATORY TO THE UNITED STATES POSTAL SERVICE

ADVO/USPS-9. At page 27 of her testimony (USPS-T-10), witness Kingsley stated that "flats volume has grown" during the period from FY 1988 to FY 1998. During oral cross examination concerning this statement, she stated that:

*"Again, the comparison was more '88 we didn't have -- of all our volume we didn't have as much flat volume as a portion of letters back then as we do in '98 or '99." Tr. 5/2111-2112.*

However, the witness was unable to provide supporting data for these statements. Tr. 5/2112-2114. Please provide, from the Carrier Cost System (CCS) or other sources, the following information:

- (a) Total city carrier delivered volumes of (i) letters and (ii) flats in FY 1988, FY 1998, and FY 1999.
- (b) The percentages which (i) letters and (ii) flats represented of total city carrier delivered volumes in FY 1988, FY 1998, and FY 1999.
- (c) The average volume of city carrier delivered (i) letters and (ii) flats per actual delivery in FY 1988, FY 1998, and FY 1999.
- (d) If the information requested in part (c) is not available on an "actual delivery" basis, please provide the average volume information per possible delivery in FY 1988, FY 1998, and FY 1999.

If any of the above information comes from sources other than the CCS, please identify the sources and describe specifically what the volume information represents.

ADVO/USPS-10. Please confirm that the following tables accurately present data on city delivery carrier pieces per actual stop for BY 1986 (from the LTV), BY 1989 (from the CCS), and BY 1998 (from the CCS). If you cannot confirm, please provide the correct information and specifically identify its sources.

**SINGLE DELIVERY RESIDENTIAL - Pieces Per Actual Stop**

	LTV BY 1986	CCS BY 1989	CCS BY 1998	Increase 98 v 86	Increase 98 v 89
Letters	3.405	3.552	3.979	16.9%	12.0%
Flats	1.248	1.249	1.386	11.1%	11.0%
Parcels	0.042	0.042	0.064	52.4%	52.4%
Accountables	0.006	0.008	0.008	33.3%	0.0%
Flats as a % of Letters	36.7%	35.2%	34.8%		

**MULTIPLE DELIVERY RESIDENTIAL - Pieces Per Actual Stop**

	LTV BY 1986	CCS BY 1989	CCS BY 1998	Increase 98 v 86	Increase 98 v 89
Letters	10.188	12.469	15.889	56.0%	27.4%
Flats	4.016	4.729	5.555	38.3%	17.5%
Parcels	0.108	0.138	0.258	138.9%	89.7%
Accountables	0.028	0.037	0.037	32.1%	0.0%
Flats as a % of Letters	39.4%	37.9%	35.0%		