

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

FOLLOW-UP INTERROGATORIES OF ADVO, INC.  
TO UNITED STATES POSTAL SERVICE WITNESS  
DONALD BARON (ADVO/USPS-T12-16-19)

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.

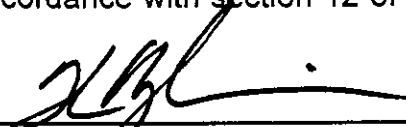
Respectfully submitted,



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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 18, 2000

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

ADVO/USPS-T12-16. Please refer to your response to ADVO/USPS-T13-23 (a), redirected to you from witness Raymond. There you state:

"The universe under study and the sampling frame can be defined as the population of all city carrier routes (other than phantom routes) in existence during PFY 1997 - Quarter 4. The units of the analysis are, according to this view, the individual routes. The universe and sampling frame can also be viewed as a set of six subpopulations. One sub-population is defined for each of the six major route categories: foot, business motorized, residential curb, residential park & loop, mixed curb, and mixed park & loop."

However, witness Raymond states that the Phase 1 on-day studies ranged from 10/14/96 to 2/13/97 and the Phase 2 multiple-day studies time frame ranged from 5/5/97 to 4/23/98 (page 8, USPS-T-13).

- (a) Please explain fully how the universe and sampling frame for the routes in the Phase 1 single-day study could have been all routes in existence in PFY 1997 - Quarter 4.
- (b) Please explain fully how the universe and sampling frame for the routes in the Phase 2 multiple-day study could have been all routes in existence in PFY 1997 - Quarter 4.
- (c) On page 34 of your testimony you indicate that four of witness Raymond's sampled files could not be located on the Carrier Route Master File for PFY 1997 - Quarter 4. Please confirm that these four routes are:

	Route	USPS Area	ES Observation Dates
CY 50	8739	Southeast	7/31/97
CY 66	0257	Pacific	12/19/97
CY 66	0281	Pacific	1/13/98
CY 04	4999	Allegheny	1/30/98

If these are not the four routes that could not be located, please provide the correct information.

- (d) Please explain why there were four routes in Mr. Raymond's sample but were not in his universe or sampling frame.

- (e) Do the results presented in parts (a) and (c) of your response include the four routes that could not be located on the Carrier Route Master File for PFY 1997 - Quarter 4?
- (f) Please provide the route types and sample weights that you have used (in your response to OCA/USPS-T-12-6) for the four routes that could not be located in the PFY 1997 - Quarter 4 Carrier Route Master File.

ADVO/USPS-T12-17. Please refer to your response to ADVO/USPS-T13-23 (a), redirected to you from witness Raymond and your statement cited in the above interrogatory.

- (a) Please explain fully how Mr. Raymond's sampling from the universe of city routes (that you have identified) was performed so as to ensure adequate representation of the universe.
- (b) Mr. Raymond has stated that, once the sites (zip codes) were selected, the routes within those sites were selected randomly. Does your comment that the universe (and sampling frame) can be viewed as a set of six populations mean that Mr. Raymond developed a sampling scheme that segmented the city letter route universe into six populations, each of which sampled randomly at some route-type-specific sampling rate? If so, please provide the details of that sampling scheme and explain how it ensures adequate representation of each of the individual route-type universes.

ADVO/USPS-T12-18. Please refer to your response to ADVO/USPS-T13-23(a) and (c) redirected to you from witness Raymond. If the time proportions for foot, aggregate park&loop, and aggregate curb are statistically valid, does that mean that the proportions of sample weighted tallies (within and among the three route types -- foot, aggregate park & loop, and aggregate curb) developed by you (and used to prepare your response) are also statistically valid? Please explain.

ADVO/USPS-T12-19. Please refer to your response to ADVO/USPS-T13-23 (a) and (c) redirected to you from witness Raymond. Please confirm that the statistical tests in your response describe the statistical comparison between Mr. Raymond's sampled routes and the universe during the time period over which those routes were sampled. If this is not correct, please so state, and explain what the statistical tests do describe.