

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
LLOYD RAYMOND (ADVO/USPS-T13-137-139)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to United States Postal Service witness Lloyd Raymond. These follow-up on his responses to Advo Interrogatories ADVO/USPS-T13-23 and 74, received on April 11 and April 13, 2000. If the witness is unable to respond to any interrogatory, we request that a response be provided by an appropriate USPS witness capable of providing an answer.


Respectfully submitted,



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Thomas W. McLaughlin
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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 RAYMOND

ADVO/USPS-T13-137. With reference to your response to USPS/ADVO-T13-23(b), please confirm, that to the best of your knowledge, the only comparison undertaken by the ES project team of how well the sampled routes reflected the universe of all city letter carrier routes at the time the samples were taken, was for the age and the gender of letter carriers. If this is incorrect, please give the details of other analyses.

ADVO/USPS-T13-138. With reference to your response to USPS/ADVO-T13-23(b) and witness Baron's response to USPS/ADVO-T13-23(a) and (c):

- (a) When were the Phase 1 routes selected? Were they selected all at one time or were they selected over a period of time? Please explain.
- (b) When were the Phase 2 routes selected? Were they selected all at one time or were they selected over a period of time? Please explain.
- (c) For purposes of your activity proportions data collection, other than randomly sampling routes at selected sites/zip, were there any attempts to ensure adequate or proportionate representation of routes by route type or delivery mode? Please explain.
- (d) For purposes of your activity proportions data collection, other than randomly sampling routes at selected sites/zip, were there any attempts to oversample any relatively uncommon route types (e.g., mixed curb or mixed loop) to ensure adequate representation of that particular route type? If so, please explain.
- (e) Were you aware of any USPS requirement that some sampled sites/zip be included so as to ensure representation of relatively uncommon route types? Please explain.
- (f) During the sample selection process, were there any conditions imposed which specified the numbers or type of routes to be sampled at a site/zip relative to the numbers or types of routes at those selected sites/zip? Please explain.

ADVO/USPS-T13-139. Advo interrogatory ADVO/USPS-T13-74 asked whether any data had been collected or analyses performed to identify the relative volume characteristics of the delivery units or routes in your study. Your response states that "there were many analyses performed on volume," and that "reports on these analyses are contained in 13 binders of reports" located at Merrifield, under protective conditions.

- (a) Do any of these analyses specifically compare the relative characteristics of delivery units or routes with high DPS volumes to those with average or low DPS volumes?
- (b) Do any of these analyses specifically compare the relative DPS and other volume characteristics characteristics of sampled delivery units or routes with national averages for comparable periods?
- (c) Do any of these analyses specifically compare the observed quantity or type of volume per actual or possible delivery, per route (by type), or per delivery unit for your sampled routes with comparable data from any regional or national level set of actual or possible deliveries, routes, or delivery units?
- (d) If your answer to any of (a)-(c) is yes, please specifically identify, for each subpart, the specific documents at Merrifield that contain these analyses, including for each the document title or caption, binder number, and page references so that these specific documents can be readily identified and located.