

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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Postal Rate and Fee Changes

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Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
WITNESS HARAHUSH TO ADVO INTERROGATORIES  
(ADVO/USPS-T3-14, 15-16)

The United States Postal Service hereby provides the responses of witness Harahush to the following interrogatories of the Advo, Inc.: ADVO/USPS-T3-11-14 and 15-16, filed on March 22 and April 4, 2000, respectively. By agreement of counsel, no answer is filed to parts (a)(ii) and (b)(ii) of interrogatory 14.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Richard T. Cooper

475 L'Enfant Plaza West, S.W.  
(202) 268-2993; Fax: -5402  
Washington, D.C. 20260-1137  
April 20, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HARA HUSH TO  
INTERROGATORIES OF ADVO INC.

**ADVO/USPS-T3-14.** The City Carrier Cost System (CCS) is used to estimate the number of possible and actual stops for Single Delivery Residential, Multiple Delivery Residential, and Business and Mixed for each of the eight city letter carrier route types.

- (a) For each stop type for each of the eight route types, please provide (i) the base year 1998 annual number of possible and actual stops estimates and (ii) their standard deviations, confidence intervals, and coefficients of variation.
- (b) For each delivery type for each of the eight route types, please provide (i) the base year 1998 annual number of possible and actual deliveries estimates and (ii) their standard deviations, confidence intervals, and coefficients of variation.

**RESPONSE:**

See attached sheet.

Attachment to ADVO/USPS-T3-14

				POSSIBLE		STOPS		
	BUS FOOT	BUS MOT	RES FOOT	RES P&L	RES CURB	MIX FOOT	MIX P&L	MIX CURB
SNGL DEL RES	2,829	29,324	862,828	7,740,620	5,033,017	12,880	62,807	30,449
MULT DEL RES	582	3,683	205,583	559,892	403,121	1,806	5,715	1,548
BUS & MIXED	37,519	115,846	145,527	654,821	445,530	4,993	19,440	9,649

				ACTUAL		STOPS		
	BUS FOOT	BUS MOT	RES FOOT	RES P&L	RES CURB	MIX FOOT	MIX P&L	MIX CURB
SNGL DEL RES 1/	2,181	26,964	780,779	7,183,643	4,708,690	11,516	59,857	28,845
MULT DEL RES	582	3,621	200,556	543,914	393,279	1,680	5,653	1,486
BUS & MIXED	33,590	106,481	129,364	587,344	402,163	4,130	17,316	8,528

				POSSIBLE		DELIVERIES		
	BUS FOOT	BUS MOT	RES FOOT	RES P&L	RES CURB	MIX FOOT	MIX P&L	MIX CURB
SNGL DEL RES	2,829	29,324	862,828	7,740,620	5,033,017	12,880	62,807	30,449
MULT DEL RES	7,722	34,961	1,432,326	3,944,173	3,611,380	10,032	46,257	16,049
BUS & MIXED	62,790	154,921	181,226	814,824	559,227	6,696	22,815	12,302

				ACTUAL		DELIVERIES		
	BUS FOOT	BUS MOT	RES FOOT	RES P&L	RES CURB	MIX FOOT	MIX P&L	MIX CURB
SNGL DEL RES 1/	2,181	26,964	780,779	7,183,643	4,708,690	11,516	59,857	28,845
MULT DEL RES	6,812	26,767	1,245,556	3,288,706	2,790,188	8,968	40,791	11,693
BUS & MIXED	36,877	139,358	156,584	699,778	486,175	5,833	20,003	10,544

1/ For Single Delivery Residential, Actual Deliveries is equal to Actual Stops

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HARA HUSH TO  
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**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 Curblin Centralized Receptacles
- (b) Delivery/Postal Centers
- (c) Office/Apartment Building Mail Receptacles, front- or rear-loaded
- (d) Curblin 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.

**RESPONSE:**

See attached sheet.

## Attachment to ADVO/USPS-T3-15

	POSSIBLE			RES P&L	STOPS		MIX FOOT	MIX P&L	MIX CURB	TOTAL
	BUS FOOT	BUS MOT	RES FT		RES CRB					
NDCBU		269	7,416	64,169	129,738			775	306	202,673
DEL CTR	27		442	2,245	2,194					4,908
OFC/APT	362	2,011	83,981	276,674	133,365	1,620	4,136	620		502,769
CURBLIN		366	932	18,902	85,665	62	62	317		106,306
MULTIFM	192	1,037	112,812	197,902	52,160	124	742	304		385,273
TOTAL	581	3,683	205,583	559,892	403,122	1,806	5,715	1,547		1,181,929

	POSSIBLE			RES P&L	DELIVERIES		MIX FOOT	MIX P&L	MIX CURB	TOTAL
	BUS FOOT	BUS MOT	RES FT		RES CRB					
NDCBU		7,592	75,414	761,250	1,558,182			10,692	4,343	2,417,473
DEL CTR	2,468		4,933	32,435	39,263					79,099
OFC/APT	4,365	22,016	1,040,770	2,536,798	1,618,557	8,670	33,392	9,977		5,274,545
CURBLIN		2,711	3,721	68,288	242,801	372	124	696		318,713
MULTIFM	889	2,643	307,487	545,402	152,576	991	2,050	1,034		1,013,072
TOTAL	7,722	34,962	1,432,325	3,944,173	3,611,379	10,033	46,258	16,050		9,102,902

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HARAHUSH TO  
INTERROGATORIES OF ADVO INC.

**ADVO/USPS-T3-16.** As used in the City Carrier Cost System, please provide a definition/description 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 Curblin Boxes.
- (c) Multiple Delivery Residential Other Receptacles.

**RESPONSE:**

- (a) Delivery/Postal Centers – Shelter units consisting of groups of receptacles mounted in a freestanding structure. They are normally used in areas of townhouses, semidetached homes, mobile home parks and apartment complexes.
- (b) Multiple Delivery Residential Curblin Boxes – Groups of rural mail receptacles located at the curblin, with delivery made by carriers from their vehicles.
- (c) Multiple Delivery Residential Other Receptacles – Situations in which delivery is to more than one mail receptacle at one stop. For example, delivery to multifamily dwellings where a group or groups of mail receptacles are located so that all may be served during a single stop is classified as *other*. (Some mail receptacle arrangements may include more than one possible stop as well as several possible deliveries.) Examples of *other* include:
  - 1) Two groups of boxes on a right-angle corner so that the carrier can deliver to all boxes in one stop.
  - 2) Boxes on either side of a narrow hall or porch so that a carrier can deliver to all boxes without stopping more than once.
  - 3) Rental post office box arrangements.

## DECLARATION

I, Thomas W. Harahush, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

Thomas W. Harahush  
Thomas W. Harahush

Date: 4/19/00

**CERTIFICATE OF SERVICE**

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

  
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Richard T. Cooper

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April 20, 2000