

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

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS BARON TO INTERROGATORY OF
ADVO, INC.
(ADVO/USPS-T12-11)

The United States Postal Service hereby provides the response of witness Baron to the following interrogatory of Advo, Inc.: ADVO/USPS-T12-11, filed on March 23, 2000.

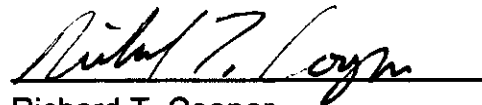
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Richard T. Cooper

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April 24, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
INTERROGATORY OF ADVO, INC.

ADVO/USPS-TI2-11. With regard to the Engineering Standards data or any other Delivery Redesign data, did you conduct any analyses of that data in an attempt to develop any alternative analyses of out-of-office street time, such as the following. If so, please provide the analyses, explain what you did, and explain why you have not presented it.

- (a) Variability analyses of collection, street support, drive time, FAT/CAT, or load time?
- (b) Any disaggregation of drive, FAT/CAT, or load time by delivery type (Level 11.2 codes), delivery type status (Level 11.3 codes), activity (Level 11.4 codes), or activity detail (Level 11.4.1 codes)?
- (c) Any comparison with disaggregated CCS results (volumes, possible stops, or actual stops by route type or stop type)?
- (d) Any other types of out-of-office costing analyses?

RESPONSE:

(a) – (d) I am aware of a preliminary load-time variability analysis that is based on the time study data in the Delivery Redesign data base. It is expected that a draft of a report on this analysis will be completed in approximately two weeks and will be provided as USPS-LR-I-310.

DECLARATION

I, Donald M. Baron, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Donald M. Baron

Date: 4-24-00

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.


Richard T. Cooper

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