

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D. C. 20268-0001

RECEIVED
APR 26 3 31 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY


POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

FOLLOW-UP INTERROGATORY OF ADVO, INC.
TO UNITED STATES POSTAL SERVICE WITNESS
LLOYD RAYMOND (ADVO/USPS-T13-149)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the attached follow-up interrogatory to United States Postal Service witness Lloyd Raymond, following up on his response to ADVO/USPS-T13-17, filed March 7, 2000. In analyzing the witness's response, Advo has discovered that the response includes data for only 297 of the 340 routes contained in witness Raymond's database, which has prompted the necessity for this follow-up.

Respectfully submitted,


John M. Burzio
Thomas W. McLaughlin
Burzio & McLaughlin
1054 31st Street, N.W.
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 26, 2000

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

ADVO/USPS-T13-149. Advo interrogatory ADVO/USPS-T13-17 asked for the number of possible deliveries by delivery type for each route code in your database.

- (a) Please confirm that your response includes information for only 297 of the total 340 routes in your database.
- (b) Please provide, in the form of an amended response to interrogatory 17, the requested information for all 340 routes in your database. If available, please provide the information in electronic as well as hard copy format.
- (c) If information for the missing 43 routes is unavailable, please state the source of the information for the 297 routes that were provided, and explain why the information is not available for the other routes.