

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

ADVO, INC. REQUEST TO THE UNITED STATES POSTAL
SERVICE FOR PRODUCTION OF DOCUMENTS UNDER
PROTECTIVE CONDITIONS (ADVO/USPS-11)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the attached requests for production of documents to the United States Postal Service. These requests concern documents, maintained at Merrifield, Virginia subject to protective conditions established by Presiding Officer's Ruling No. R2000-1/27, that are directly related to the data collection that is the subject of USPS witness Raymond's testimony. Advo is not at this time proposing any change in the confidential treatment of these documents, which would continue to be subject to those protective conditions.

Advo is willing to consult with the Postal Service concerning the scope of these requests and the method/format of document production in an effort to facilitate the production effort involved. Questions concerning these matters should be directed to Advo's undersigned counsel.

Respectfully submitted,



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Counsel for ADVO, INC.

ADVO, INC. REQUESTS FOR PRODUCTION OF DOCUMENTS TO THE UNITED STATES POSTAL SERVICE

ADVO/USPS-11. For each of the following routes that were the subject of witness Raymond's data collection, please provide the documents listed in a. and b. below :

<u>CY Code</u>	<u>Route</u>	<u>CY Code</u>	<u>Route</u>
CY02	1560	CY40	8405
CY02	1595	CY48	0337
CY04	4225	CY51	6410
CY04	4233	CY52	1121
CY05	2806	CY53	2212
CY05	2822	CY53	2221
CY08	1638	CY55	0611
CY17	1926	CY58	8212
CY17	1928	CY60	1913
CY18	2912	CY62	0415
CY18	2947	CY63	0802
CY27	1428	CY63	0806
CY33	1612	CY63	0815
CY34	3125	CY63	0820
CY37	0321		

- a. Please provide copies of the video tapes (including video date/time recordings) taken for each of the above routes.
- b. Please provide all field edited and final edited reports (including field edited and final edited data collection sheets, annotated Forms 3999X, data collector comments, etc.) for each of the above routes.

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 28, 2000